


Consultation Response Form

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<u>Organisation (if applicable)</u>	Farmers Union of Wales

1. NDF Outcomes (chapter 3)

The NDF has proposed 11 Outcomes as an ambition of where we want to be in 20 years' time.

- Overall, to what extent do you agree or disagree the 11 Outcomes are a realistic vision for the NDF?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

Agree with all of them	Agree with most of them	Agree with some of them	Agree with none of them	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree with any of the 11 Outcomes, please tell us why:

In the opinion of our members, the Outcomes are more akin to aspirations for Wales in 20 years' time than Outcomes and do not recognise that some, although desirable, are very ambitious in extent. For example outcome 7, "all methods of travel will need to have low environmental impact" do not appreciate that electric cars are unlikely to have the required battery range between charging to make them a viable option in hilly, remote rural areas.

Another example of overly ambitious targets would be outcome 4 – an increase of 80% of Welsh speakers on current levels. This seems very ambitious and members wondered how this figure was derived.

The Outcomes appear to have the same shortcomings as the 7 Well Being of Future Generation goals as they do not recognise that one goal or outcome, is linked to another, and in some circumstances there will be a trade-off between delivering one and the other. For example, outcome 2 attempts to retain people in rural areas, whilst at the same time, outcome 5 will draw people to live and work in cities and large towns. If people migrate from either rural population to urban towns, or vice versa, then both outcomes cannot be realised at the same time.

Outcome 6 seeks to "increase prosperity and productivity" at the same time that

outcomes 10 and 11 seek to increase biodiversity and store carbon. Most landowners are aware that land management practices that increase biodiversity and store carbon generally lead to a decrease in productivity and profitability. In other words, the outcomes listed in the consultation do not recognise that a trade-off exists between them.

Members commented that agriculture is a massive industry, yet there is no discussion or proposed outcomes, nor designated agenda set out in the NDF.

2. Spatial Strategy (policies 1 - 4)

The NDF **spatial strategy** is a guiding framework for where large-scale change and nationally important developments will be focused over the next 20 years.

- To what extent do you agree or disagree with the spatial strategy and key principles for development in...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
Urban areas (Policies 1, 2 & 3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rural areas (Policy 4)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

The FUW support most of the key principles for the development of rural areas, in which the vast majority of its members reside. Members thought there should be a focus on relocating farming families, after retirement, to housing in an area of their choice, thereby releasing the farmhouse for the next generation or new entrant. Succession is a significant problem within the agriculture sector, as the work is hard, the hours are long, and the outside nature of the work is often conducted in inclement conditions.

Unless the National Development Framework grasps the challenge and delivers prosperity for all of Wales' inhabitants, then social mobility and rural poverty will remain a problem.

Members agreed that there was a need to differentiate between the living standards of communities in rural locations on the fringes of urban areas and those that are in the genuinely remote rural settings of Wales. Communities' ability to secure affordable housing, secure employment, good health, quality education offering sufficient curricular options, and reliable public transport, differ between rural populations on the fringes of urban settlements and those in more remote areas.

As stated above, members felt that agriculture should be a specific agenda item in the NDF.

- If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

FUW members strongly agreed that areas of little or no mobile coverage should be targeted, so that Welsh rural businesses can compete in global markets.

Some members commented that access to mobile coverage was an absolute necessity as they already have experienced the closure of banks in rural towns and without mobile phone coverage, working and running businesses became a real challenge.

Other members commented that mobile phone coverage black spots placed rural children at a disadvantage, from both an education and welfare perspective.

5. Low Emission Vehicles (policy 7)

- To what extent do you agree or disagree that policy 7 will enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

As mentioned above, the FUW have reservations about the roll out of ultra- low emission vehicles, including electric vehicles, as members believed that the technology is not sufficiently advanced to make this a viable and reliable option in remote rural areas.

Most electric vehicles are currently only capable of driving around 100 miles before battery recharging, whereas the best can achieve up to 250 miles. However, this range is greatly reduced if the journey included steep hills and inclines. It is unlikely that governments can justify the infrastructure investment required to support the introduction of ultra-low emission vehicles to rural areas, as the number of vehicles are comparatively low. Members did not think this was a realistic proposition.

Members were concerned if future energy policies disadvantaged rural communities, as many rural inhabitants were forced to travel some considerable distance by car from the home to the workplace, as the public travel system was either inadequate or absent.

Members also commented that it could be some time before alternative low emission agricultural vehicles became available. Some members commented that tractors running on biodiesel fuel as an alternative to fossil fuel were experiencing problems with insufficient power and performance.

6. Green Infrastructure (policies 8 & 9)

- To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

FUW members reiterated concerns expressed in our response to the Sustainable Farming and our Land consultation (SFaOL) in 2019, as they are equally relevant to some of the proposals on biodiversity enhancement and ecosystem resilience within the NDF.

As acknowledged in Natural Resources Wales' State of Natural Resources Report, using land for food production is an essential part of natural resource use and management, and while agricultural intensification has had some negative impacts on some species and ecosystems, there is overwhelming evidence that other factors, including reductions in agricultural activity and afforestation, have also had impacts.

Analysis by Plantlife has shown that more than half of all wild plants need regular management or disturbance to thrive, and that 39.6% of species would decline within a decade if the land on which they grow is abandoned.

Therefore, when the NDF document says that "we need to expand and make connections between our designated sites to increase the ability of species and ecosystems to adapt", members highlighted that such changes to policy which directly or inadvertently further reduce agricultural activity or encourage land abandonment are likely to increase biodiversity loss in Wales.

On the development of a national forest, members noted the NDF document highlighted, "right tree in the right place". This concurred with the FUW's response to the SFaOL consultation, where we commented that, "the effective replacement of existing ecosystems with woodlands with virtually no herbaceous cover has had severe impacts on Welsh habitats, as well as significant adverse effects for surrounding habitat and species, with woodland cover associated with population declines in a number of species,".

On the expansion of ecological networks members were concerned if the NDF planned to increase the percentage designated status of Wales, the restrictions imposed on the farmers would have a detrimental effect on their businesses.

7. Renewable Energy and District Heat Networks (policies 10-15)

- To what extent do you agree or disagree with the NDF's policies to lower carbon emissions in Wales using...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
Large scale wind and solar developments	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
District heat networks	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree with the NDF's approaches to green infrastructure, renewable energy or district heat networks, what alternative approaches should we consider to help Wales to enhance its biodiversity and transition to a low carbon economy?

FUW members did not entirely disagree with large scale wind and solar renewable energy developments as part of a mix of renewable projects, including small scale on farm developments. However, they commented that using Wales' land to produce food was very important, and this also mitigated climate change through reducing fossil fuel use to import consumables.

Others noted the emphasis on large scale developments and wondered if this excluded the development of several small contiguous farms, working as one venture.

The consultation supported other renewable energy technologies in principle and mentioned that the Welsh Government will prepare an Energy Atlas. Members wondered why these alternatives were not discussed and evaluated in the National Development Framework consultation.

Other renewable technologies such as hydroelectric, tidal wave and offshore wind farms have the added advantage of not occupying large tracts of productive land, thereby releasing this land to grow food for the nation.

Members supported the provision of affordable grants to install solar panels for every household. This would require the development of the electricity network to allow this to happen.

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8. The Regions (policy 16)

- To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The NDF identifies three overall regions of Wales, each with their own distinct opportunities and challenges. These are North Wales, Mid and South West Wales, and South East Wales.

9. North Wales (policies 17-22)

We have identified Wrexham and Deeside as the main focus of development in North Wales. A new green belt will be created to manage the form of growth. A number of coastal towns are identified as having key regional roles, while we support growth and development at Holyhead Port. We will support improved transport infrastructure in the region, including a North Wales Metro, and support better connectivity with England. North West Wales is recognised as having potential to supply low-carbon energy on a strategic scale.

- To what extent do you agree or disagree with the proposed policies and approach for the North Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

10. Mid and South West Wales (policies 23-26)

Swansea Bay and Llanelli is the main urban area within the region and is our preferred location for growth. We also identify a number of rural and market towns, and the four Haven Towns in Pembrokeshire, as being regionally important. The haven Waterway is nationally important and its development is supported. We support proposals for a Swansea Bay Metro.

- To what extent do you agree or disagree with the proposed policies and approach for the Mid and South West Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

11. South East Wales (policies 27-33)

In South East Wales we are proposing to enhance Cardiff's role as the capital and secure more sustainable growth in Newport and the Valleys. A green belt around Newport and eastern parts of the region will support the spatial strategy and focus development on existing cities and towns. Transport Orientated Development, using locations benefitting from mainline railway and Metro stations, will shape the approach to development across the region. There is support for the growth and development of Cardiff Airport.

- To what extent do you agree or disagree with the proposed policies and approach for the South East Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If you have any comments about the NDF's approach or policies to the three regions, please tell us. If you have any alternatives, please explain them and tell us why you think they would be better.

Members wondered why the NDF regions did not match the boundaries of the six land regions selected as Area Statements, as Area Statements were selected to rethink the way our natural resources are managed and used. Area statements were designed to coordinate work and to build the resilience of ecosystems, so having conflicting boundaries for planning issues, and management of the environment will introduce confusion.

Generally, members supported policies designed on a regional basis, but its success would be dependent on coordinating the objectives across the boundaries of local authorities, area statements, NDF, with national objectives.

Members again noted the emphasis placed on urban development and infrastructure within each region but rural businesses, such as agricultural businesses, were not.

12. Integrated Sustainability Appraisal

As part of the consultation process, an Integrated Sustainability Appraisal (ISA) was conducted to assess the social, economic and environmental impacts of a plan. The report identified a number of monitoring indicators, including health, equalities, Welsh language, the impact on rural communities, children's rights, climate change and economic development.

- Do you have any comments on the findings of the Integrated Sustainability Appraisal Report? Please outline any further alternative monitoring indicators you consider would strengthen the ISA.

The Integrated Sustainability Appraisal Report appears to be a complex multi-factorial analysis which was beyond the comprehension levels of the majority of our members.

It does appear to have been conducted in a systematic manner, but as the ISA concedes itself, the complexity and margin for error can only provide an indication of the certainty of the impacts.

The report also concedes that unforeseen circumstances and the cumulative effect of policies could lead to unanticipated outcomes.

In view of the above, the FUW's members felt that a measure of common sense should prevail as some outcomes are more important than others. They felt that a nation's economy was of the utmost importance.

As regards the monitoring indicators listed for each ISA objective, they seem to lack definition of which variable would be used for each outcome and no specific units are offered.

However, one assumes that the data analyses have produced outcome predictions for the short, medium and long term. The predictions should be compared with the monitored indicators and if the model proves to be inaccurate, then modifications would be required.

13. Habitats Regulations Assessment

As part of the development of the NDF, a Habitats Regulations Assessment (HRA) was undertaken. The purpose of the HRA process is to identify, assess and address any 'significant effects' of the plan on sites such as Special Areas of Conservation and Special Protection Areas for birds.

- Do you have any comments on the Habitats Regulations Assessment report?

It was noted that the Habitats Regulations Assessment focussed renewable development in the lower risk areas of Wales, but did not preclude development elsewhere.

This approach was supported by members, as the combined designated areas account for approximately 25% of Wales. If all areas produced renewable energy at the expense of burning fossil fuels, air quality would improve and as a result the health and well-being of people and habitats would likewise improve.

The FUW would therefore support as much relaxation and flexibility as possible within the planning system in designated areas to enable more of its members to participate in renewable energy production.

14. Welsh Language

We would like to know your views on the effects that the NDF would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

- What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Given that the Welsh Government's figures show agriculture to have the highest proportion of Welsh speakers in any employment category – 43% compared with 27% for the next highest category (Education) – a framework which fails to take direct account of the economic needs of agriculture and family farms would, by definition, threaten the use of the language by the industry in which it is most preserved.

As a consequence of the above findings, the NDF policy will have considerable effect on the numbers and distribution of Welsh speakers in Wales. This will, as referred to earlier, be dependent on supporting the agriculture sector with social policies on housing, transport, and business viability.

Please also explain how you believe the proposed NDF could be formulated or changed so as to have:

- I. positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and
- II. no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

The well-being of the Welsh language is intrinsically linked to the well-being communities in rural Wales. As stated above, any policies which negatively impact on the ability of those communities to thrive and prosper will not produce the positive effects required.

Please note previous comments that increasing Welsh speakers by 80% was considered unrealistic and over ambitious.

15. Further comments

- Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

16. Are you...?

Providing your own personal response	<input type="checkbox"/>
Submitting a response on behalf of an organisation	<input checked="" type="checkbox"/>

Responses to the consultation will be shared with the National Assembly for Wales and are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here	<input type="checkbox"/>
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