



Tirweddau Cymru
Landscapes Wales

Framework

Q1. The Scheme will provide a long-term approach to support for our agricultural sector to respond to evolving challenges and changing needs, contributing to the Sustainable Land Management objectives. In your view, what may strengthen this support?

The designations of our landscapes recognise their value for nature, landscape, culture and heritage. They have been shaped by farmers and land managers for generations and the majority of land within our designated landscapes continues to be farmed.

We welcome the statement in the consultation document that “*Support to deliver more for protected landscapes. These actions will be bespoke to the farm and surrounding area and will align with the special qualities of Areas of Outstanding Natural Beauty or a National Park,*” the SFS needs to align with the *purposes* of AONBs (now National Landscapes) and National Parks. While also ensuring consistency with WG policy approaches in planning, shoreline management planning and nutrient management.

The purposes of National Parks are:

- To conserve and enhance the natural beauty, wildlife and cultural heritage of their areas
- In addition
- To Promote opportunities for the understanding and enjoyment of the special qualities of national parks by the public

In carrying out these purposes, National Park Authorities are also required to seek to foster the economic and social well-being of local communities in the National Park.

AONBs (National Landscapes) share these purposes as far as natural beauty and increasing the understanding and enjoyment of the designated landscapes. Both NPAs and AONBs seek to foster the economic and social well-being of local communities.

Our eight Designated Landscapes (DLs) in Wales are working together in partnership as Tirweddau Cymru Landscapes Wales (TCLW). Our DLs have a critical role to play in the future of farming in Wales, their designation recognises their value as landscapes and contribution to nature, culture and heritage. Our Designated Landscapes continue to be shaped by farmers and are currently a key delivery mechanism for action on both the nature and climate emergencies. A resilient and sustainable support system for farming is crucial for their future. Alignment with the work of the designated landscapes will support the agricultural sector and secure long term integrated and collaborative ways of working, which is required in achieving on our purposes and duties.

Welsh Government (WG) have stated that this Scheme is the start of a long term programme to support our agricultural industry in Wales. If this is to become reality then any new scheme must be adequately resourced, both in terms of funding and staff, to deliver for farmers and land management now and into the future.

SFS has been anticipated as a fundamental game changer in land management to deliver the aspirations of many organisations and the agricultural sector itself. Reduction in the rural affairs budget is extremely disappointing , especially when consideration is given to the economic multiplier effect of funding delivered in our rural communities (x7 for conservation capital works as one example).

This undermines WG ambition to deliver on sustainable policies, innovative strategies and collaborative efforts to mitigate the effects of climate change, the loss of biodiversity, delivery of 30x30 targets, and tackling fuel and child poverty in rural communities.

The Minister for Rural Affairs and North Wales has stated that the new Sustainable Farming Scheme (SFS) support should be resilient and sustainable, for this to be the case, we are concerned that without adequate resources the SFS programme cannot deliver on WG aspirations.

Sufficient resources for the scheme are essential if WG are to honour its plan to begin and maintain a “relationship” with land managers and to be more inclusive of ideas and experience from the people managing the land. The Welsh Government co-design progress of the SFS has yet to reflect this development of relationship and taking forward ideas and experience of those managing the land as well as taking into account past agri environment successes and failures.

An advisor-based support model also would both avoid or mitigate unintended consequences in real time as well as maximise beneficial outcomes in a way that the current proposed SFS cannot and has the ability to draw in additional support from local networks of experts.

There are opportunities to maximise the synergy and complementarity between the SFS, the objectives of the Food (Wales) Bill, Future Wales and Planning Policy Wales. For example, Wales is predominantly a red meat-farming country, the most efficient means of converting on-farm energy into food on poor quality land, research exemplifying the net zero benefits of grass-fed livestock is emerging, and the health benefits of regular but not excessive red meat consumption are also well established. The WG should use the SFS to be an exemplar in promoting these benefits. However, Wales is not self-sufficient at all in most other food crops and, through the SFS, Food (Wales) Bill, Future Wales and PP Wales, needs to address this vulnerability directly and to exemplify the costs-benefits of what Welsh farming does deliver. Wales's Designated Landscapes are well positioned to assist WG with this.

The intentions of SFS include improving environmental outcomes on farms, which in turn will improve product quality. These gains will differ throughout Wales's regions but a common thread is the link between good quality food, people's eating choices, the cost and availability of fresh produce and the low understanding of the role of Welsh agriculture and its contribution to Welsh rural life, economy and landscapes. We draw your attention to the findings from research commissioned by the then National Association for Areas of Outstanding Natural Beauty:

- Farming for the Nation: AONBs as test beds for a new Environmental Land Management Scheme
- Farming for the Nation: AONB tests and trials for Environmental Land Management
- Agricultural Transition in Protected Landscapes: How Protected Landscape Teams Support Their Farming Communities.
- Further information is available from the National Landscapes Association [National Landscapes - National Landscapes \(national-landscapes.org.uk\)](https://national-landscapes.org.uk).

As the drive for achieving net zero GHG emissions intensifies, Wales has the chance to re-position Welsh farming as a significant solution to this, to people's healthy eating habits, well-being and sense of identity. Wales can re-position red meat production and domestic

consumption in terms of lower input, higher quality and sustainable consumption of higher quality products.

We recommend that WG explains clearly the intent of the Universal Actions and the contributions farmers will be making to net zero and nature recovery through the SFS. Indeed, livestock farming is essential if Wales is to deliver its contributions to net zero and to maintain several habitats of principal importance to Wales. For example:

Improving herd health (UA15, 16 and 17) can also be achieved through several other UAs, which in turn reduces GHG emissions.

The UAs can help farms to reduce livestock GHG emissions (CO_2 , N_2O , CH_3) in other ways, through diversifying pasture, maintaining or introducing rotations, encouraging farmers to consider more efficient production systems, reducing imported and synthetic inputs and increasing agricultural regenerative methods.

The UAs can help farms to reduce other on-farm GHG emissions and improve livestock health through introducing wood pasture (coed-cae) as a contribution to 10% tree cover (and extending this through optional and collaborative actions), recycling on-farm GHG emissions and nutrients (soil carbon, soil nutrients), reducing stocking densities (where appropriate) and using multi-species cover crops (especially if these use the local native seed suppliers developing in Wales's Designated Landscapes and elsewhere in Wales).

If this has not been done already, the SFS also needs to show the costs-benefits in terms of measured added value that maintaining a higher quality agriculture sector provides Wales. There are opportunities to align the UAs and their implementation more strongly with other policy areas delivered by WG. There is for example no UA on nutrient management specifically, despite the creation of the NVZ in Wales and encouragement from WG for the establishment of Nutrient Management Boards, no specific emphasis on water management. This appears to be a missed opportunity.

In terms of the exclusions for the 10% tree cover target, there is no recognition of Best and Most Versatile Agricultural land Grade 1, 2a or 3a, despite PPW 12 and TAN 6 directing planning authorities that:

“Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations. If land in grades 1, 2 or 3a does need to be developed, and there is a choice between sites of different grades, development should be directed to land of the lowest grade.”

We recommend that final proposals are assessed in a revised Integrated Impact Assessment that includes the principles for the Environmental Guidance Body for Wales, i.e. integration, precautionary, prevention, rectification at source, and polluter pays.

Universal Actions

Q2. There will be Universal requirements in the SFS to have woodland cover at least 10% of suitable land, and to manage a minimum of 10% of your farm for biodiversity.

a) What are your views on these requirements?

b) What support might you need to achieve them?

We are concerned like others that the 10% woodland cover requirement is an arbitrary target that has been selected in response to WG planting targets, requiring further thought and understanding of land tenure and pragmatic information about growing trees in various systems and environments. This requirement currently lacks safeguards against inappropriate or detrimental planting being undertaken with numerous unintended consequences. Safeguards are required especially in our designated landscapes against such consequences.

We would suggest a combined total percentage target for woodland and habitat on holdings. This would accommodate fertile, improved ground in landscapes such as Llyn, Ynys Mon, Pembrokeshire and other areas that genuinely cannot accommodate 10% tree cover regardless of changes in land-use. In parts of coastal Pembrokeshire, the Local Planning Authority is receiving objections from NRW to tree planting landscaping schemes submitted to the LPA on the basis that there is no chance of these actually surviving in such locations.

Using this approach with temporary habitat formation may yield more for biodiversity and elements such as invertebrates and farmland birds, and be more palatable for land managers.

As set out above, some parts of Wales, notably South Pembrokeshire have high levels of Best and Most Versatile Land which WG planning policy seeks to protect from use which would prevent future agricultural use. We believe that greater flexibility enabling Farmers to respond to the specific habitat and soil conditions on their farm would assist in achieving improved outcomes.

Furthermore, we believe that tree planting should be relocated to the Optional Action layer which provides better regulation on what is planted where and at what densities due to our concerns for inappropriate planting and impacts on access, historical environment, biodiversity and landscape.

Placing this action in the optional layer will support those who wish to increase tree cover and likelihood of the investment being better maintained and cared for. It also enables more time for realistic natural capital markets to emerge, into which land managers can offer carbon and other public benefit credits where happy to do so.

Removal of area payment of bracken and utilising this funding to transition bracken areas to more valuable biodiversity habitat (including trees where appropriate) would also be favoured.

Another approach that could be adopted is Net Benefit gain for Biodiversity, a 2-3% net gain would mean that new planting could be targeted on a landscape level, e.g., coed-cae, to complement our current habitats in a collaborative way instead of fragmenting the countryside with poorly managed un-connected blocks of woodland. We recommend considering a sliding scale of payment to be available on the woodland management portion of the payment to stimulate people to start planting rather than turning them away/off altogether from the concept. We suggest it would be better to increase woodland cover by a few % with well positioned and maintained trees rather than having low uptake, or poorly thought-out sites and species that were then not maintained.

We recommend that pursuing this requirement requires consideration of individual landscape types to avoid adverse, unintended consequences. Input on individual landscapes would also help highlight opportunities e.g. the traditional landscape of Gower is a small scale mosaic which could absorb much in the way of small scale tree planting and extensive hedgerows.

Current proposals raise concerns about the fairness of the option with planting exemptions in the scheme available for tenant farmers, which could result in forcing owner occupiers to plant, with adverse consequences and substantial impact on asset values. We are concerned that such actions may not align with the principles the Wellbeing of Future Generations Act in being fair and equitable.

We are also concerned that this might push people to actively look for loopholes in the system rather than delivering something meaningful (if it were a SMART target).

The current proposals lack consideration of system viability thresholds e.g. livestock units necessary to occupy committed annual work units (AWUs) and meeting loan repayments where there has been investment in infrastructure, technology etc.

We appreciate the situation on improved lowland ground is difficult, these land parcels have high economical value, versatility in production, asking to plant trees when the forecasted decline in yields due to climate change predicts more volatility and uncertainties seems counter intuitive in sustainability. These areas are also the areas of Wales with the highest Best and Most Versatile Agricultural Land as indicated in page 27 of Future Wales.

We recommend that more flexibility is offered in the UA (sliding scale or smaller net gains). For lowland scenarios we recommend that more scope is offered alternatively to stimulate hedgerow restoration, especially those grubbed out in the last 10-20 years, and standard trees within those hedges with additionality being provided by parkland trees. For the latter, we recommend that wood pasture is actively promoted within the SFS. This would improve landscape permeability and movement for wildlife, provide livestock shade and fodder, and provide a carbon sink along with water quality and quantity measures.

To reiterate, having the flexibility of a maximum percentage target for woodland OR habitat action would also be a valuable compromise, in particular for improved, lowland settings, where the ability to produce could be harnessed and utilised in particular where farmland bird populations have declined so dramatically. These are the areas that could address this decline through protein crops, cereal options etc.

We have concerns that the requirement may bring further imbalance to fragile upland economies and ecosystems, (25% of Eryri and 35% of Bannau is common land), and a large proportion of upland units use commoning as a main role of agriculture. Significant amounts of these units have very low amounts of improved or semi-improved ground that would be suitable for tree planting. If these areas will have to be planted it leads to possible reductions in the hefted grazing flocks which can be disruptive on the open mountain, dereliction of farming systems (due to decreased livestock numbers making turning out uneconomical and lack of labour to gather the mountains), degradation of the stratified sheep production system in Wales and a significant threat from the spread of non-native species into areas with reduced grazing pressure, *Rhododendron ponticum* being the primary concern, Sitka spruce and western hemlock also a worry. This would come on the back of 25 years of Eryri NP tackling the spread of *Rhododendron* and millions (including public money) being spent which could be threatened.

A further concern for the upland in relation to 10% planting requirement would be the continued decline of cattle grazing from the uplands. With limited improved ground, the need for additional planting on some units will reduce their harvesting potential putting greater costs of carrying in feed on a marginal system economically which could lead to the demise of upland cattle grazing which are fundamental in conservation grazing and enhancing biodiversity through their grazing patterns with additional effects on supporting systems such as livestock markets etc.

We believe in the face of this that marginal (old SDA and LFA) beef producers should be supported where beef suckler cows are retained to enhance capacity for conservation grazing and enhanced diversity of grazing, in particular for the smaller herds where economies of scale are not available (<30 cows). We are already seeing upland herds shrinking at alarming rates with the demise of Glastir habitat payments. Waiting for the optional and collaborative layers to become active may be too late for many. An underpinning payment for suckler cow retention could be a basis for further Optional Actions to enhance this with production efficiencies etc.

Mixed grazing with cattle could also provide the biodiversity requirement/gain for those units that struggle with habitat/tree cover % targets.

Mandatory tree planting could lead to poor sites, species and specimens being planted, high failure rates or stunted growth and a high probability of the plantings being destroyed should scheme rules change which will have been a waste of public funds. There are also potential negative landscape,

archaeological and conservation impacts depending on the type of planting introduced, the existing habitat and landscape pattern. Pembrokeshire Coast National Park Authority in its Tree and Woodland Guidance adopted 2023 sets out the risks *“Woodland creation could have a significant effect on the recognised qualities of this valued landscape, its landscape diversity and rich ecological and historic environment. New tree and woodland planting should take account of the special qualities and distinctive features of the receiving landscape – with a focus on ‘the right tree in the right place’. This is not least in recognition of the fact that other natural habitats that may be characteristic in a landscape are equally as important (or in some cases more so) for ecosystem service delivery, including climate regulation.”*

There are concerns in relation to lack of assurance in terms of native and local provenance of plants and lack of limits for coniferous/fir component of planting, which would be particularly important for upland areas in our Designated Landscapes where most of the areas are sensitive to acidifying soils and the effects on its water courses. In Pembrokeshire, there are particular concerns about landscape impacts on exposed coastal areas as identified in the Authority’s adopted SPG on Tree and Woodland Guidance. The SPG notes on page 35 that there are very limited opportunities for woodland creation in the Landscape Character Areas along the coastline of the National Park, due to their extensive semi-natural habitats (particularly along the coastal strip), their distinctively open character and expansive views, and the strong sense of place and connection to the sea.

Other Designated Landscapes may have more climatic and landscape variations that could accommodate alternative species, but significant consideration will need to be applied to species selection, and again, such sensitivities may be better suited to the Optional Actions layer.

We advise that tree planting might require an Environmental Impact Assessment, which will include alone and in combination considerations. Where additional operations are included, for example farm / forestry tracks built through permitted development, these will require prior notification to the local planning authority, so will need to accord with LDP policies.

Planting in Designated landscapes should be undertaken following consultation with the DL teams, with refined data sets including local guidance, supported by visual impact, archaeological assessment and ecological impact assessments. Failure to do so could lead to significant areas or blocks of inappropriate planting being undertaken in sensitive areas and this may help buffer sites with significant landscape, seascape implications, habitat or historic environment impacts. NRW

sensory data would be paramount in consideration, as well as the DLs' own landscape character assessments, again lending greater consideration to placing the objective as a Optional Action.

Commenting on the finer details, for UA11, we recommend a higher density of hedgerow standard trees than 1 per 50 m. For UA12 standing and fallen deadwood are vital ecosystem components. Rather than encourage a farmer to remove standing deadwood "for health and safety reasons," we recommend amending this to "fell and retain" standing deadwood where otherwise there is a health and safety risk.

Retaining all deadwood may contribute to fuel poverty pressures on some house-holds, therefore consideration should be applied to a % retained as deadwood.

We recommend that a closed season is added for grazed woodlands otherwise neither the ground flora nor saplings will be retained. Saplings and a healthy understorey are essential for woodland and treescape longevity and enable the farmer to deliver the guidance to "Support natural regeneration of trees within the woodland where appropriate." If the understorey were to be treated as a separate habitat layer, in addition to the ground flora layer, i.e., adding a further 'shape file' to the farm's eligible area, this would incentivise appropriate management of the different structural layers.

Protecting trees from damage could be strengthened and we recommend that guidance is provided to ensure that root systems are protected, e.g., no cultivation or ground disturbance under the leaf drop / canopy line. We further recommend that protection is provided from farmyard runoff, parking and storage or burial of farm vehicles or other old vehicles, machinery and waste.

For the scheme rule, we recommend that further consideration is given to the reasons for soft rush-dominated areas. These might indicate an artificially shallow water table within a field caused by below-ground compaction through repeated shallow cultivation. Whilst tree planting here might help to improve water infiltration and drawing up of nutrients, an alternative might be for the farmer to sow the multi-species cover crop to create a species-rich ley, where the deeper rooting species break the compaction.

We recommend that farmers are encouraged to contact organisations such as the Nature-Friendly Farming Network and Local Nature Partnerships to help them maximise the benefits of their actions

for nature recovery. For example, farmers would improve the impact of multi-species cover crops by targeting them to support ground-nesting bird populations.

We recommend that farmers are not discouraged from using herbicides to control INNS (invasive non-native species) such as Japanese Knotweed, where no viable alternative exists.

We recommend that where a farm supports more than 10% habitat already, this is rewarded by the SFS and avoids perverse outcomes whereby a lack of tree cover leads to other habitat being planted, resulting in a loss of overall habitat coverage.

For shelterbelts and shelterwoods, we recommend that these are planted to be diffuse rather than dense blocks, which create blustery conditions for livestock in the lee of the wind. Shelterbelts are more effective if they include a mixture of broadleaved species with some conifers. These permit diffuse wind passage at a reduced speed, providing effective shelter for stock as well as more opportunities for biodiversity and lower landscape impact.

We recommend that specific guidance is included about the management, conservation and succession planning for veteran and ancient trees.

We have concerns that the Habitat Review will not be able to successfully identify Section 7 priority habitats in a self service model which may result in planting of habitats of high value. Areas of priority habitat will become isolated and un-manageable (severed from grazing) if trees are planted on surrounding 'lower quality' habitat. E.g. the grazing management of some wetlands may be dependant on a complex of drier habitat in the surrounding area. Both of these scenarios have happened even with the current planting layers. We recommend therefore that guidance is provided on identifying the Section 7 habitats (Environment (Wales) Act 2017) present on a farm, to ensure that if tree planting is proposed for any of these, it is appropriate for that habitat type. Mapping the S7 habitats will assist farm businesses to deliver the sustainable land management objective (Section 1, Agriculture (Wales) Act 2023).

We recommend that nature networks mapping, Priority Ecological and Resilient Ecological Networks mapping tools are used to help advise farmers as they develop proposals for the optional and collaborative actions.

Where there is enough semi-natural habitat to meet the minimum 10% threshold, and subject to an assessment to verify habitat conditions, those areas above the threshold identified as being of lesser quality habitat (e.g. dense bracken, species poor dry grasslands, soft rush dominated grasslands with the exception of peatlands) could be considered for tree planting. Having said this, the loss of lesser quality habitats risks losing the opportunity for the restoration of open priority habitat types and connected resilient networks for species dependant on open habitats or mosaics of vegetation. E.g. the planting of wet grasslands dominated by soft rush may serve to reduce opportunities for habitat restoration for species with defined connectivity needs such as marsh fritillary butterfly.

The Biodiversity and Resilience of Ecosystems Duty (the Section 6 duty) set out in the Environment (Wales) Act 2016 requires that public authorities must seek to maintain and enhance biodiversity so far as consistent with the proper exercise of their functions, and in so doing, promote the resilience of ecosystems.

Section 7 of that act outlines a list of the living organisms of principal importance for the purpose of maintaining and enhancing biodiversity in relation to Wales. The list consists of 17 mammals, 51 species of birds, 8 Reptiles, 188 invertebrates and 77 species of vascular plant which have not been considered at all.

These species have a wide range of habitat needs and cannot be sustained on 'high quality' or Priority Habitats alone and instead rely on a mosaic of Priority and 'lower quality' habitats as well as other landscape features.

Notwithstanding our earlier comments, the pressure of the scheme (double counting trees as habitat and tree cover) will direct farmers to reduce habitat suitable for a whole suite of Section 7 species i.e. you could say it is an anticipated loss.

This impact is not acknowledged or assessed or mitigated in the Biodiversity Impact Assessment so it is difficult to see how WG could be seen to be discharging its duty under this Act.

Open coastal locations are especially sensitive to tree planting and clarification is urgently needed on the statement that "We will also need to consider how best to address exposed high altitude or coastal locations." Interchangeability of habitats and woodland cover would be very

beneficial and could maximise the enhancement of coastal landscapes where options such as hedgerow restoration might offer a more appropriate response.

Coastal Landscapes are very neglected throughout the whole scheme and this is a huge missed opportunity to deliver multiple benefits along the 870 mile coastal path. This is a very distinctive and important habitat on a National scale. We think WG should consider 'featuring' this landscape in the same way it has with woodlands and peatlands as along with biodiversity value it provides significant social value.

We recommend that Coastal Slope and grassland should be included in the habitat definitions. The clear ambitions for peatlands and trees are not replicated for biodiversity.

We have concerns that it will be difficult to provide the detailed advice and support needed to successfully enable sustainable habitat maintenance.

Managing semi-natural habitats appropriately can require a range of interventions some of which may be quite specialist. There is a big risk that the means available will define the ambition and this could lead to a reduction in stocking and management on semi-natural habitats some of which will have a negative impact.

In practice management of semi-natural habitats requires a whole range of support beyond advice notes and financial incentive and this may preclude landowners from receiving support for habitat management from other sources.

We recommend that other options to 'save' carbon should be supported, including small scale renewables, anaerobic digesters, energy crop harvesting (e.g., bracken, *Molinia*) and peat restoration.

Q.3 Aside from the 10% woodland and habitat requirements, will the Universal Actions:

a) Provide benefit for your farm business?

B) Provide an achievable set of actions paid for through the Universal Baseline Payment?

Most of the aims are achievable, however we have noted comments on habitat and tree cover, and in addition find that the requirement for ponds and scrapes is oversimplified in its approach. In particular for those smaller holdings where topography, and soils will be ineffective for pond or scrape formation in particular at the size and area required, or where the land is tenanted and the landowner will not consent. We are also concerned that small, fragmented areas of lowland peat, which due to their small size are unlikely to be mapped, might be lost through tree planting or pond and scrape creation, to the detriment of Wales' GHG emissions.

As set out above, we request clarification on whether these actions will contradict WG planning policy PPW12 with planting/works implications on Best and Most Versatile Agriculture Land.

We recommend that clarification is provided that if pond/scrape formation is not possible then the same area of temporary habitat will be acceptable.

We recommend clarification on whether the land thresholds are based on total holding, or that owned.

We recommend that an 80ha level is too high for the first level and we propose that more levels of control are included e.g. <50ha, 50-100ha, and 100+

We suggest that where land tenure/type does not suit scrape or pond formation, then in ditch baffles/ leaky woody dams could be deployed and will provide the same benefit for wildlife in existing features, would be easier to accommodate and will be better linked to existing habitat and connectivity corridors.

The planning consent will be relevant for pond/scrape formation (engineering operations are unlikely to be accepted as agricultural permitted development in the current wording).

We advise that, even with amended wording of planning documents, the scheme will significantly increase planning work-loads for local authorities and the cost of the process (various surveys, technical drawings etc.) will be significant.

A wider focus on water management /run off and nutrients could benefit the existing UAs and make stronger connections to other WG policy approaches.

In line with our earlier recommendation (Q1) to promote the intent of the SFS and the value of what farmers would be doing, we recommend promoting the value of hedgerow and scrub

fodder to animal health and nutrition, for example the comparable volume of trace elements, minerals, protein, fats and sugars in woody forage to grass crops.

We seek clarification on how a managed hedgerow is likely to be entirely stockproof within five years without fence lines.

We seek clarification on why, if it is acceptable to “have gaps up to 5% of the length [of a hedgerow]...,” this 5% would not need to be fenced to make it stockproof.

We recommend that the species planted in hedgerows must reflect local distinctiveness, for example the occurrence of bird cherry *Prunus padus* in Brecknockshire hedgerows, which is not apparent in Carmarthenshire ones.

Q4. On-farm data reporting allows the Welsh Government to confirm actions are being undertaken and help you to make decisions about your farm. In your view, is the reporting requirement for the Universal Actions appropriate?

It appears that the requirements will be a heavier burden/more workload for the smaller farms, unless the payments for these smaller holdings is being uplifted to reflect this. The general feel from the scheme is that a 400 or 1000 acre holding will have the same requirement as a 25 acre holding, which will translate as little unfair in relation to payment and will deter some applicants.

We suggest a sliding scale or menu of requirements should be considered to make requirements proportionate to the size of holding/payment.

There is a real fear of how data will be used. We recommend this needs to be acknowledged and genuine assurances offered.

The consequences of virtual monitoring and assessment on human rights and mental health need to be considered.

Q5. The Stability Payment will provide additional support during the Transition Period. In your view, is this appropriate whilst the Optional and Collaborative Actions are being introduced?

It is essential that common land systems are supported and stabilised as much as possible as they host substantial areas of SSSI and SAC within designated landscapes and are very fragile management units as discussed in Q3.

For common land, we recommend removing the statement that “...some commons have become undergrazed resulting in unfavourable condition... .” Unfavourable condition is an objective assessment arrived at through formal monitoring of conservation objectives set for an area; most commons have not been surveyed for this. Every common requires a bespoke management approach.

In BBNP, most commons have a history of heavy grazing pressure, a lot of this documented by the former MAFF, CCW and BBNPA. A lot of common land would benefit from a ‘rest’ from this historic heavy pressure. Indeed, large areas are showing recovery of dwarf shrubs (heather, bilberry) where stocking rates have declined. These same areas might also be at increased risk of arson-related wildfire but all such fires are started by people. Also, heather-rich moorland on commons is not the product of historic agricultural management but of historic sporting management, i.e. grouse moors maintained deliberately through rotational burning.

We recommend that rather than facilitating new or developing existing commoners associations, WG accelerates its work to complete the guidance under the Commons (Wales) Act 2006 to establish Commons Councils. These would provide the ideal mechanism and core for collaborative actions on registered commons. Given the high proportion of common land in Wales’s DLs, we would welcome the opportunity to work closely with WG to develop the common land elements.

We advise that payments apportioned to registered commoners can only be for measures within the registered rights of each commoner, pooled within the relevant Association. As an example, under the Glastir Common Land Scheme, the capital elements delivered by the six Mynydd Du Glastir Commoners Associations were delivered by the freeholder, the BBNPA because these actions were outside the rights of the commoners.

Scheme Operation
Q6. We have proposed that applicants should have sole management responsibility for the land for 10 months and ensure completion of the Universal Actions for the full scheme year (12 months). In your view, is the 10-month period sufficient? Yes, we believe that this is suitable and required to allow the undertaking of some actions and measures that will enhance carbon capture and nature recovery as shorter control periods will pose difficulty in the suitable management of the ground for most actions. Q7. We are proposing the use of a single carbon calculator for everyone in the Scheme. Do you agree and how might we best support you to complete this? Comparable methods for the purpose of reporting and benchmarking are important. The appropriateness of measures and modelling is paramount. The measures used in the underpinning science and the modelling used within the carbon calculator must reflect and be applicable to the land in question. We believe that it is fundamental that all farmers in Wales use the same mechanism and algorithms in this element of work so that the results are comparable, measurement meaningful and can be replicated as data and algorithms improve and become more sensitive. Unless the data is comparable and repeatable then the learning potential and tracking of change will be diminished/of no value. Developing a calculator that is connected to the mandatory soil testing would be beneficial to gain a full picture and in turn understand the farm-based carbon store. Often the modelling used does not equate the full carbon cycle and including sequestering and other off-setting initiatives is imperative in establishing a valued full picture. We ask that WG share publicly the methodology behind this calculator in the interests of transparency and to ensure adequate scrutiny with a view to preventing any mistakes within formulae.

Q8. To ensure continued high standards on our farms, we have outlined a proportionate approach to controls and sanctions, including compliance with additional legislation as a condition of Scheme payment. Do you have any views on this approach?

We agree that new standards and regulations should be incorporated into the scheme, provided that the cost implications may be born by the industry. Should the expected implication of compliance have significant financial implications, we would recommend open dialogue and discussion on a way forward.

Q9. Adopting the Welsh Government appeals process will provide an effective and efficient mechanism. Is there any reason we should deviate from this?

With a new system in place, there will be a transition period of new issues arising and learning as we proceed. The removal of a panel of peers could be premature with a new system and it also removes transparency, impartiality and potential confidence in the farming community as WG would be seen as having full power to judge and punish others unilaterally. We would support the continued option of a panel of peers as part of the appeals process for a period after transition until the new scheme is established and reviewed at a later period.

Payment Methodology

Q10. We would like to know your views on the proposed approach to:

- a) the SFS universal baseline payment**
- b) the SFS stability payment**

We agree with this approach but recommend that clarification is given on whether this will be paid as a grant or as a delivery contract. However, it is sensible to ensure that the optional and collaborative layers also aim to improve current land management system and not alienate or eliminate them, otherwise land managers will be in a precarious situation by 2029.

Payments must include the 'social element' as payment, even where valuations are difficult with a built in commitment to review costs routinely as cost incurred rates have not been kept up to date in previous/current schemes.

Transition Period

Q.11. Farmers outside the Scheme may wish to access support for actions similar to those offered in the Optional and Collaborative Layers. In your view, should farmers within the Scheme receive priority support to undertake these actions?

It is difficult to comment on this until we have better understanding of uptake rates and influence of SFS UA on various industry sectors. For example dairy and arable may veer away from the SFS due to issues such as % tree cover and habitat, yet, there are significant portions of Wales where CA actions would be desirable on lands occupied by these farming systems.

There are geographical regions where UA clients are surrounded by those not in the system, for example the Uwch Gwyrfaï district. Here, at the top of the hill is a significant collection of small units, reliant on commoning that will probably shy away for the SFS because of the levels of demands/actions for small holdings (<25 acres). The middle ground might have a few mid-sized units that could enter UA. At the bottom of the district, which is dominated by improved ground and large dairy herds, the area is ripe for collaborative actions based on SSSI/SAC/NNR significant water courses and bathing areas. Here, the larger intensive dairy areas are currently in a negative position on SFS, therefore a CA group with UA bias will have difficulty in gaining traction/points for actions. This will be replicated in the Mon, Llyn, Dyffryn Clwyd, Penfro, Gwyr districts etc. Similar nuances will pertain to other areas on Wales.

We consider allowing farmers outside the scheme to access Optional and Collaborative actions as a key opportunity to maximise the outputs of SFS at a much needed landscape scale, especially where collaborative themes (e.g. Coastal Connectivity, DL special qualities) may cross a variety of farm types, sizes and systems.

Q12. What actions and support within the Optional and Collaborative layers do you believe should be prioritised?

The Designated Landscapes are eager and able to assist developing actions for the OA and CA layers of the scheme, but would offer the following as starter points:

1. Manage and enhance habitats through site-specific actions over and above the Universal layer. This has the potential to pull in many of the other options offered such as additional water bodies and tree planting on habitat land, natural flood management structures and practices, also, tree surgery to vary riparian tree canopies (so that watercourse species benefit from dappled light), beneficial natural boundaries (hedgerows, green banks, dry stone walls, and slate fencing are important pools for pioneer species and offer shelter to wildlife and livestock), encourage the protection and spread of Celtic rainforests (this might involve eradication of invasive/problem species such as *Rhododendron ponticum* and ground preparation for spread), bespoke grazing plans for commons with facilitation included, wildfire prevention and control, and many more.
2. Darken skies. The effect of light pollution on nature and people has been vastly underestimated in policy but increasingly well documented in the science literature. Knowledge exchange and suitable light fitting/retrofitting should be supported as a priority (potential to reduce energy consumption as well).
3. Support UK native breeds at risk (cattle, sheep, equines) and better understand their behaviour and the genetic resource they and heritage crops offer to help navigate challenges.
4. Support the management/eradication of invasive non-native species and other problem species.
5. Guide and support the use of natural soil applications such as fungal composts and biochar.
6. Encourage the development and use of measuring and monitoring technologies aimed at natural cycles (carbon, nitrogen, water).
7. Assist scheme participants with the decarbonisation of farming operations to include renewable energy generation and energy generated through 'waste' utilisation (anaerobic

digestion, wood waste generated heat and power, biochar production etc.) encouraging on-farm/local nutrient and energy-based circular economies).

8. Establish or adapt options which help people engage with and access the natural environment. Include strategically prioritised paths which are enhanced to enable wider use and better interpretation of surroundings.

9. Support to deliver more for protected landscapes aligning with the landscape features of each area.

10. Utilize existing ambassador schemes such as the Bannau Brycheiniog and Eryri Ambassador Scheme as part of the Continuous Professional Development offering.

11. Upgrading existing PRoW and establishing new access are delivered to British Standards and in consultation with the statutory RoW authority, along with strategic access to water, open water swimming, canoeing etc. developed in a strategic and collaborative mode with adequate controls and protocols, with flow gauges, access and exit points with biosecurity measures etc. and enabling farmers to obtain a financial return for this access provision.

This could bring significant health and well being opportunities and tourist value to rural communities, and formalised and collaborative delivery could be a positive development.

TCLW see an opportunity to use the Integrated Natural Resources Scheme as a primer for this, together with other blended finance. Strategically, this would enable Wales's Designated Landscapes to deliver at scale for a sustained period, helping to develop long-term OECMs (Other Effective Area-Based Conservation Measures), which is a WG objective to help meet the global and national 30x30 objective. We recommend that Wales's DLs would provide a publicly transparent delivery platform for the SFS: established under primary legislation and governed by IUCN management guidelines embodied in National Park and National Landscape Management Plans, the DLs are subject to public and audited scrutiny. They would, therefore, support the Minister in demonstrating the public value for money of the SFS within their borders, i.e. across 25% of Wales.

We seek clarification on whether the sustainable farming review, which originally was a proposed precursor for the SFS, will be introduced at the optional / collaborative level. In addition, we seek clarification on whether the habitat baseline review replaced the sustainable farming review.

To recover nature and achieve net zero, we recommend that the WG must maximise the impact and cost-effectiveness of its revenue in a joined-up way. For example, the habitat baseline review data must start with a desktop survey using data from the local environmental records centres ([LERCs Wales](#)) and redacted field data from the reviews must be shared with them because the reviews are financed publicly. Their data outputs, therefore, must be transparent and sharable for the public benefit and for the benefit of local nature partnerships, which are also grant-assisted by WG.

We note that hedgerows are frequently cited in the document, but there is limited reference to other traditional boundaries. These are valuable landscape, historic and connectivity features that should have a specific action apportioned to them and their care/restoration.

TCLW currently has a collaborative programme running across Welsh DLs, supporting farmers to create, restore and maintain traditional field boundaries. This programme has proven very popular and successful. We would be grateful to share further details of this with the WG SFS team.

BPS

Q13. Do you agree with the proposed changes to BPS from 2025? This includes:

- a) The rate at which BPS payments are reduced.**
- b) Closing the National Reserve to new entrants.**
- c) Thresholds for capping.**
- d) Restricting the transfer and lease of entitlements.**

a) reduction rates seem clear and measured and will allow those transitioning over, and the delivery mechanism, time to adjust and address teething issues.

b) closing the national reserve to new entrants is acceptable because a new entrant's transition directly to the new structure will be clearer and simpler

c) we feel that the ethical position of receiving large public payments is reflected in the proposal.

d) agree

We recommend that more information events are scheduled to introduce farmers to the intent and direction of the SFS. Whilst the services that Farming Connect provide are welcomed, we are uncertain that this expertise is reaching all farms and farmers. The SFS represents a fundamental shift for most farm businesses, introducing uncertainty and risk. We recommend that during the BPS transition, a programme of regular information workshops is scheduled explaining the intent and global environmental reasoning of the SFS. TCLW would welcome the opportunity to assist with such a programme.

Regulations

Q14. We would like to know your views on our proposed approach to secondary legislation, which will support BPS and the introduction of support schemes under the powers in the Agriculture (Wales) Act 2023.

No comment.

Evidence

Q15. Economic analysis and modelling will conclude in 2024 and will provide evidence to inform the final decision on Scheme implementation by Welsh Ministers. We would like to know your views on the existing analysis and evidence required.

It would be prudent to put measures in place that will allow the replication of data gathering and modelling to assess if actions are leading to meaningful change. In addition land management systems and workflows need to be better understood. This would highlight systems thresholds which all should be wary of (infrastructure, labour, seasonality, stratified breeding and movement through markets etc.). Such an understanding will identify the most appropriate points of leverage and behaviour system change is needed.

It is difficult to comment on effectiveness/value of the data modelling due to insufficient detail on the budget and data back from the modelling (for land managers and NGOs).

The lack of data sharing has been problematic for NGOs and conservation agencies to allow development of policy and interventions, we hope that the new regime would allow the easier sharing of data for conservation purposes.

Monitoring & Evaluation

Q16. We would like to know your views on which information and evidence should be used to monitor and evaluate the Scheme.

The sentence "Information, including your personal information, may be the subject of a request by another member of the public. When responding to such requests the Welsh Government may be required to release information, including your personal information." requires scenarios to better explain what is meant. As it is, it is likely to cause upset and fear and brings into question the legality and necessity of releasing such information.

Care must be taken not to invade privacy, cause undue stress, and generally take liberties in the name of efficiency.

Virtual/remote sensing is a concern.

TCLW would offer the following as main areas of evidence, with baseline information critical to assess change:

1. Attributes of land (geology, soil type, elevation, aspect, climate, proximity to services etc.)
2. Condition of land from a natural cycles perspective (carbon, nitrogen, water) rated in consideration of attributes
3. Habitat condition from an associated species perspective
4. Associated species density, abundance, and condition
5. Land management practices
6. Effect of land management practices

7. Socio-economic relationships

Along with ERAMMP data to allow monitoring to connect to national existing datasets.

Other

Q17. What, in your opinion, would be the likely effects of the SFS on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

Supporting the communities and people involved in land management and its supporting industries will sustain and enhance the use of Welsh, and it is at this level that the importance of small family orientated farms should be of concern.

There is a need to better understand the relationships between DLs, land management and language. Working with Cynllun Gwledig LPIP Rural Wales could further knowledge.

We have highlighted several cases where small units may find the SFS unfavourable or burdensome for the size of payment in relation to size of holding, and would urge careful consideration of these elements to prevent the loss/demise of small, part time holdings as they could be detrimental to the numbers of people actively using Welsh in rural areas.

In addition we feel there are opportunities for interpretation on Public Rights of Way and other accessible areas.

There are opportunities to record field, feature, place, and route names etc., share names given to habitats, species, landscape features, natural processes, and seasonal changes etc. including regional differences, terms associated with land management to be recorded and interpreted, regional differences in language/terms due to differences in natural attributes, produce, development, influences, movement of people, and the resultant systems of land management, to bring in local cultures/customs and their influence in the arts etc. Names should be contributed to the List of the Historic Place Names of Wales and there is the

potential for involvement from other organisations such as the Welsh Place-Name Society to record, appraise, and share.

Q18. In your opinion, could the SFS be formulated or changed so as to:

- **have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English; or**
- **mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?**

Delivery of the CA and OA should be fully bilingual as a basic requirement.

We would suggest SFS information being written in Welsh as the source language in some areas would have a positive effect on the use of the Welsh language.

Providing a Wales-wide Welsh language service to deliver SFS is vitally important, e.g. by ensuring that a sufficient number of officers in each area can speak Welsh and that full support is provided to enable Welsh learners and new Welsh speakers to develop their skills and ensure good engagement with key stakeholders and ensure that SFS is realised to its potential.

We recommend the integration of Welsh names into the English language text and staff around the scheme. As Eryri NPA have shown there is no need for an English substitute for many Welsh names / phrases and English users will quickly become accustomed to this change and will thus increase their knowledge of and use of the Welsh language.

Support should be provided for marketing local/regional produce that uses Welsh as a primary name and as an unique selling point.

We highlight [The Value of “Welshness” | Business Wales - Food and drink \(gov.wales\)](#) work, and suggest this is applied by the SFS Scheme and staff as a way of promoting the positive value of farming and farming produce from Wales.

Q19. Do you have any additional comments on any aspect of the consultation document?

WG documentation refers to the loss of up to 5,500 jobs in the countryside. Bearing in mind the significance of Welsh language and culture to the Wellbeing of Future Generations Act and

Cymraeg 2050, recognising the impact of the SFS on the Welsh language as the language of employment, economy, governance, education, social and cultural life in vast swathes of rural Wales is critical. This doesn't appear to have been considered in the Welsh Language Impact Assessment.

Data from the 2021 Census demonstrates that a higher percentage of Welsh speakers work within the agriculture, forestry and fishing than within the general population. This will be amplified when considering other areas of employment linked to agriculture, eg. veterinary care, food production, machinery dealers, contractors, feed merchants, agricultural consultants, etc. Employment is a key factor in the survival and vitality of the language in areas throughout Wales and the information provided by WG itself suggests that there could be significant repercussions for the language and therefore for all aspects of life in rural Wales, should be loss of employment be as drastic as suggested.

Providing access to Welsh language service across Wales to deliver SFS is imperative, eg. by ensuring that a sufficient number of officers in every region have the ability to speak Welsh and that full support is provided to Welsh learners and new Welsh speakers to develop their skills to ensure good engagement with key stakeholders and to ensure the delivery of SFS to its potential.

Access and recreation

There is a distinct lack of detail on the role of access and recreation in the consultation in particular those high-pressure areas which make them difficult to manage for conservation or agriculture because of people pressure. We feel that these access providers (National Trails, key rights of way and access to open areas and water) could be accommodated better in the UA layer with enhanced payments, OR, reduced expectation for entry/acceptance.

Rights of Way and their infrastructure maintained by the land manager should be included in the UA payment structure to support the upkeep of standards and accessibility, and would underpin Optional Actions to upgrade accessibility of these networks.

We recommend that WG includes regulations for i) maintaining Public Rights of Way, in accordance with British Standards, and access land in liaison with the statutory Local Access

Fora; ii) Workplace Recycling Regulations; and iii) meeting legal obligations for not introducing INNS.

As a general principle a programme such as “Ambassador” scheme which are increasingly adopted by destinations may be a mechanism to support farmers in knowledge transfer and awareness of certain management issues.

Biodiversity and habitat management

We recommend that the requirement for heavily modified peatland to be “actively managed” when the farm enters the scheme needs clarification. Does active management refer to the list of “do nots” in UA6?

For the CPD modules, DLs would welcome the opportunity to assist with the category 5 people, animals and place module. Standard modules on biosecurity are offered by the Great Britain Non-Native Species Secretariat and DLs offer modules on Park ambassador schemes.

For habitat, we recommend that the “features of the landscape” are cross-referenced with the similar requirement for local planning authorities in PPWales and with the nature networks mapping and Nature Networks Fund. This would increase the SFS’s contribution to integrated landscape management, in the spirit of the Conservation of Habitats and Species Regulations 2017.

We recommend that guidance is provided on what constitutes over-grazed habitat because determining over- and under grazing depends on the objectives set for the land; it is a relative rather than absolute measure.

We recommend that further consideration is given to “do not apply lime on habitat land” where, for example, this might assist with reducing fuel load on areas prone to arson-related wildfire, including common land.

For “do not burn vegetation,” this will not apply to registered common land because commons graziers do not have any rights to burn vegetation. We recommend, therefore, that this is underlined in the underpinning regulations.

We recommend that a new UA is provided for the control and eradication of INNS or an INNS control requirement is added for habitat maintenance; we would be happy to advise on this and a further UA on water quality management.

We agree that the Scheme should assist farmers where their land might affect a riverine SSSI but we recommend that guidance is provided to explain the extent of and types of impact a farm's activities might have on water entering a riverine SSSI, and similarly a lake or canal SSSI.

We seek clarification on why a "wildlife pond" is described as only up to one hectare in size. The Freshwater Habitats Trust stipulates up to two hectares. We recommend that best practice guidance is provided for pond creation, including not introducing any non-native species, permitting natural colonisation rather than installing plants and animals, observing best practice in biosecurity and contacting the local nature partnership about managing aquatic INNS.

There needs to be clarification on the position of Management Agreements offered by Designated Landscapes. In Pembrokeshire well over 50 Management Agreements are in place to protect/enhance/restore habitats from Coastal Scrub to Flower Rich Pasture and Hay Meadows. Would these fall under the same remit as the Section 15 Agreements if their purposes were agreed? This would ensure that there is no risk of double funding. Due to the limited data sharing in the past unless businesses share their involvement in such schemes willingly, we have no way of knowing if double funding is an issue.

The Biodiversity Assessment requires more rigour and depth and must consider the very real risks being identified by consultees. Risks that have not been acknowledged or considered cannot be monitored or mitigated.

For farm biosecurity, we recommend that this includes plant and animal INNS and that these are recorded during the Habitat Baseline Review.

We recommend that the LERCs Wales are consulted for HBR1 and HBR2 and that for the latter, the local nature partnerships are consulted. Within DLs, the designated landscape authority must be consulted.

Data

For the data confirmation exercise, we strongly recommend that RPW does this in partnership with LERCs Wales, and pulls in data and analysis from the Living Wales Data Portal (funded by WG) and NRW's nature network mapping. For DLs, we recommend that RPW includes its landscape character assessments, for example BBNPA has recently updated the Park's LCA.

We recommend that redacted carbon calculator data are shared with Public Service Boards and DL authorities to assist with reporting for Wales's Race to Net Zero and for annual climate change reporting.

For data disclosure we recommend that National Park Authorities and National Landscape Boards are included alongside local authorities, as well as LERCs Wales.

Historic Environment

The inclusion of the historic environment as a Universal Action (UA14) is welcomed. Also, it is positive that the different types of historic environment features are listed under the UA14 chapter.

The protection and management of the historic environment under UA14 is welcomed, but further work is required on what will be included and expected. Maintaining traditional buildings could be burdensome financially on some holdings along with work required on the definitions of traditional buildings.

Erosion scar repairs also requires careful consideration as it could lead to inappropriate techniques and materials being applied, along with some sites (e.g. steep earth banked features) where work will require specialist equipment to be undertaken safely. Again, the cost implications on some actions could be substantial.

The UA14 chapter states that farms will have to follow general guidance, it is unlikely that a general guidance can cover all scenarios that might be applicable to the management of a historic environment feature. As such, it would be advisable to add 'or specific guidance where applicable'. This should be provided by the historic environment organisations responsible for this, probably Cadw/Heneb – the Trust for Welsh Archaeology.

Under the section referring to information and advice from organisations in the UA14 chapter, the Welsh Archaeological Trusts need to be changed to ‘Heneb – The Trust for Welsh Archaeology’. Also, ‘other historic environment organisations’ should be changed to ‘other relevant organisations’. The latter is more appropriate as there will be organisations involved in historic environment activities, such as National Park Authorities but they are not a historic environment specific organisation.

From a historic environment perspective, the proposal that applicable Universal Actions are mandatory is welcomed as the historic environment will be protected where it applies.

From a historic environment perspective, the scheme rule that there must be 10% tree cover on ‘all’ farms in the scheme by the end of 2029 is concerning. This could have a detrimental impact on the historic environment, notably the setting of monuments and also designated historic landscapes.

Under the proposed woodland creation rule (UA12), archaeological features is the only sensitive feature mentioned for the historic environment when considering ‘unplantable areas’. We recommend this should be changed from ‘archaeological features’ to ‘historic environment features (see list under UA14)’.

Under the woodland maintenance chapter (UA12), we recommend the condition that ‘all trees’ in woodland should be retained should include a caveat around the historic environment. There are cases where removal of trees is required to protect and manage a monument. There are also cases where woodland has been left unmanaged, resulting in issues for the historic environment features. This point also applies in the case of naturally regenerating woodland. Implications of tree removal should not be detracted from the holding’s % tree cover as the action would be beyond the control of the land manager.

The provision of an advisory service to support farms in relation to the historic environment is important for appropriate management and protection. In light of the Welsh Government cuts to the historic environment provision, we would welcome clarification on how the advice and guidance regarding management and conservation of historic features will be provided, and by whom for the Universal and Optional Actions. Under-resourcing could undermine the principle and aim of UA14.

We also seek clarification on how condition evidence, for example geotagged photographs, will be provided and to whom? We assume that designated monument data will be provided to

Cadw. The scheme makes provision for undesignated Historic Environment features as part of farm plans too. Will this data be provided to the Historic Environment Records? This is the essential statutory baseline for promoting beneficial management of the Historic Environment of Wales. We seek clarification on how this will operate at a landscape scale within a designated landscape context, and what the proposed systems will be for the ongoing advice provision, liaison and ongoing monitoring of the scheme?

Renewable Energy

TCLW feels there is significant potential in renewable energy production as part of the UA layer, in particular for those holdings with difficulty in achieving 10% tree cover.

PV cells on existing buildings has considerable potential:

- Immediate carbon reductions
- Minimal landscape implication (the buildings are already there),
- Permitted development process in place.
- Develops a green industry in rural Wales.
- Readies rural Wales for a fossil free future, can initiate local energy networks.
- Pushes regulators to remove “zombie loadings” from the network (undeveloped applications that have “booked” network capacity).
- Zero habitat implications.
- Reduces fuel and child poverty
- Available to most owned and tenanted farms.