



Introduction

Designated under primary legislation, the 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 incentive system for farming is crucial for their future. Alignment with the work of the designated landscapes will incentivise 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 the Sustainable Farming Scheme (SFS) 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.

Key messages

- Designated Landscapes have been shaped by farmers and other land managers for generations and the majority of land within our designated landscapes continues to be farmed
- Farming is one of the central contributors to landscape character and quality.
- Designated Landscapes have worked collaboratively with farmers since their creation and maintain a close and practical working relationship with them.
- The development of the SFS provides an opportunity to integrate the purposes of Designated Landscapes with incentives for positive farming practice
- 10% woodland cover requirement requires further thought and understanding of land tenure and pragmatic information about growing trees in various systems and environments.

- Given the proven track record of Designated Landscape teams as collaborators and facilitators the potential for developing their role in providing support for farming is significant.
- Designated Landscape staff can facilitate local conversations with farmers and land managers to co-create a compelling vision for future food and farming.
- Specialist advisors, embedded in Designated Landscapes but working in partnership through TCLW, would enable a more consistent approach to farmer and land manager engagement

We welcomed the statement in the SFS consultation document: *“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.”* We stressed that 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 (now 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 through effective partnerships.

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. Like previous agri-environment schemes in Wales, the SFS will be the 'biggest show in town' to help nature's recovery. So, it is also the biggest tool available to Designated Landscapes and must therefore be designed with our farmers in mind.

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 developing relationship and taking forward ideas and experience of those managing the land as well as considering past agri-environment successes and failures. We are aware for example of successful, locally-led schemes elsewhere such as Ireland's "The Burren Programme – *Farming for Conservation.*"

We recommend that an advisor-based support model would mitigate and avoid unintended consequences in real time as well as maximise beneficial outcomes in a way that the current proposed SFS cannot, would have the ability to draw in additional support from local networks of experts and to conserve and enhance local distinctiveness.

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.

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. Wales's Designated Landscapes are the *prime* place to lead this work.

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. We have seen this already through the Glastir Woodland Creation Scheme. Safeguards are required especially in our Designated Landscapes against such consequences.

We have suggested a combined total percentage target for woodland and habitat on holdings. This would accommodate fertile, improved ground in landscapes such as Llyn, Ynys Môn, 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 trees 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.

We recommend that final woodland 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.

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 synergistic 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. Designated Landscape teams are experienced in this way of working.

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. Our landscape character assessments allow us to identify where woodland or other priorities will help to enhance landscape and nature.

Current proposals raise concerns about the fairness of the option of planting exemptions in the scheme available for tenant farmers, which could force 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. In Designated Landscapes, this could undermine landscape character, which has a cultural element too.

A further concern, for uplands in relation to 10% tree 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. Cattle enhance biodiversity through their grazing patterns with additional effects on supporting systems such as livestock markets etc.

In light of this, we recommend 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 will 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 wasted public funds.

There are also potential negative landscape, archaeological and conservation impacts depending on the type of planting introduced, the existing habitat and landscape character.

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.

We advise that tree planting might require an Environmental Impact Assessment and potentially a Habitat Regulations Assessment, each of which will include alone and in-combination considerations. Where additional operations are included, for example farm / forestry tracks built under permitted development rights, 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. Such consultation will 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.

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. We have concerns that the Habitat Review will not successfully identify Section 7 priority habitats (Environment (Wales) Act 2016) in the proposed self-service model, which will result in planting of other habitats of high value. We recommend that where a farm supports more than 10% habitat already, this is rewarded by the SFS and avoids perverse outcomes such as a lack of tree cover leading to

other habitat being planted, resulting in a loss of overall habitat diversity. Diversity is one of the Welsh Government's principles of sustainable management of natural resources.

Section 7 of that Act also lists the species of principal importance for the purpose of maintaining and enhancing biodiversity in relation to Wales. The species list consists of 17 mammals, 51 birds, 8 reptiles, 188 invertebrates and 77 vascular plants but the scheme has not considered these 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 would be discharging its duty under this Act, let alone according with the new duties to be introduced under the Environmental Governance Body.

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

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.

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.

Further Scheme development

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 aquatic species benefit from dappled light), beneficial natural boundaries (hedgerows, green banks, dry stone walls, and slate fencing are important homes 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 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, integrated with the Public Rights of Way network.

9. 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.

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

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