



**RTPI Cymru**

Royal Town Planning Institute  
Sefydliad Cynllunio Trefol Brenhinol

Royal Town Planning Institute  
Cymru (RTPI Cymru)  
Studio 107  
Creative Quarter  
8a Morgan Arcade  
Cardiff  
CF10 1AF  
Tel +44 (0)20 7929 8197  
email [walespolicy@rtpi.org.uk](mailto:walespolicy@rtpi.org.uk)  
[www.rtpi.org.uk/wales](http://www.rtpi.org.uk/wales)

7 March 2024

**e-mail response sent to: [SustainableFarmingScheme@gov.wales](mailto:SustainableFarmingScheme@gov.wales)**

Dear Sir/Madam,

**Response to: Sustainable Farming Scheme**

The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing some 27,000 spatial planners. RTPI Cymru represents the RTPI in Wales, with 1,300 members. The Institute seeks to advance the science and art of planning, working for the long-term common good and well-being of current and future generations. The RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, training and development.

Thank you for the opportunity to respond to the above consultation. Our general, planning related comments are set out below.

The Welsh landscape is a vital part of the nation's identity, economically important for the agricultural industry and tourism as well as its importance for biodiversity and wellbeing. Although farmers have a critical role to play as custodians of the landscape and environment, much of their activity lies outside of the planning system. As a result, subsidies provide an important way of incentivising best practice alongside regulatory controls sitting primarily with Natural Resources Wales (NRW). There is potential for the Sustainable Farming Scheme to have multiple benefits in terms of biodiversity, carbon sequestration, natural flood management and reduction of phosphates entering watercourses through either surface water runoff or excessive fertiliser application.

Wales has a range of case studies and good practice that demonstrate the potential for a partnership approach to sustainable land management. These include:

- Pont Projects ([Home | PONT \(pontcymru.org\)](https://www.pontcymru.org));
- The Usk Catchment Partnership: This partnership involves a wide group of stakeholders including Planners and Farmers, working together to address a wide variety of goals including nutrients and clean, safe and resilient water resources in the area.
- RSPB Futurescapes Projects [Futurescapes - CaBA \(catchmentbasedapproach.org\)](https://www.catchmentbasedapproach.org);
- Wildlife Trust Living Landscapes Projects [Living Landscapes | Wildlife Trusts Wales \(wtwales.org\)](https://www.wtwales.org), and;
- Natural Trust in Wales: Payment for Outcomes scheme [Farming for the future in Llŷn | Wales | National Trust](https://www.naturaltrust.org.uk)

It is noted that the requirement for 10% habitat creation under UA8 applies only where the farm does not currently have 10% semi natural habitat under UA7, and that qualifying areas can sometimes double-up to meet multiple requirements, for example woodland with ground flora (page 30).

Thought may be needed on how these habitat and tree cover requirements apply on farms comprising wholly 'Best and Most Versatile' (BMV) land, where in some cases their lowest quality 10% is better than the best land on farms elsewhere. A clear policy hierarchy would be helpful to clarify whether food production, woodland planting, renewable energy generation or habitat creation are the primary policy objective. For example, can 10% of a BMV farm be used for solar energy with semi natural habitat below to achieve UA8 or does the planning policy presumption against renewable energy on BMV land rule this out?

The Welsh Government will need to ensure that NRW is properly resourced to assess the management plans required under UA9. The under-resourcing of NRW is already affecting their ability to positively engage in other key areas of work such as planning and flooding and this needs to be addressed to ensure shared objectives can be achieved.

The proposed flexibility to meet the 10% tree cover requirement set out on page 41 is noted. UA13 might benefit from a reference to tree planting assisting with natural flood management.

The references to Areas of Outstanding Natural Beauty (AONBs) e.g. (page 85) should be revised to refer to National Landscapes.

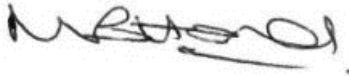
Given the considerable issues with water quality in some of Wales' rivers due to phosphate and ammonia levels, there could be opportunities for the Sustainable Farming Scheme to incentivise change. Ammonia is mentioned on page 85 as an 'optional action' measure which feels like a missed opportunity.

The need to plan for long term food production and security, and wider climate change is now more important than ever. We would suggest that Technical Advice Note 6 (2010) is reviewed to ensure it is serving rural areas and dealing with current key issues and aligns with the new PPW12.

The introduction of the Sustainable Farming Scheme presents an opportunity for the Welsh Government to address the unintended consequences of other legislation such as SUDS which unhelpfully captures a number of small-scale activities on farms that need not be subject to regulatory control by the Sustainable Drainage Approval Body (SAB). Examples include the ponds required under UA10 and covered or hardstanding fertiliser storage areas required to minimise phosphates and other chemicals entering watercourses, all of which could helpfully be excluded from SUDS requirements to reduce the administrative burden on both farmers and Local Authorities.

If you require further assistance, please contact RTPI Cymru on 020 7929 8197 or e-mail Mark Hand at [walespolicy@rtpi.org.uk](mailto:walespolicy@rtpi.org.uk)

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Mark Hand', with a horizontal line underneath.

Mark Hand MRTPI  
**Director**