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NFU Cymru Response; Welsh Government Consultation Document: Permitted Development: Amendments to the Town and Country Planning (General Permitted Development) Order 1995

NFU Cymru welcomes the opportunity to respond to the Welsh Government Permitted Development Consultation document. NFU Cymru champions Welsh farming and represents farmers throughout Wales and across all sectors.

NFU Cymru's vision is for a productive, profitable and progressive farming sector producing world renowned climate-friendly food in an environment and landscape that provides habitats for our nature to thrive. Welsh food and farming delivering economic, environmental, cultural and social benefits for all the people of Wales whilst meeting our ambition for net zero agriculture by 2040.

The importance of the farming industry in rural Wales cannot be over-stated. Welsh farming businesses are the backbone of the Welsh rural economy, the axis around which rural communities turn. The raw ingredients that we produce are the cornerstone of the multi million pound Welsh food and drink industry which is Wales' largest employer employing over 239,000 people.

Welsh farmers also play a key role maintaining and enhancing our natural environment – Wales' key asset. Farming activity supports a diverse range of species, habitats and ecosystems, provides a range of ecosystem services including flood alleviation, carbon sequestration, climate change mitigation; and delivers the significant backdrop for Wales' tourism and recreation sector worth an estimated £2.5bn annually.

NFU Cymru has some brief comments to make on questions in this consultation relevant to our membership.

Question 1: Should the additional days granted by Class A of Part 4A be retained permanently, permitting temporary uses to take place for up to 56 days (28 days for specified uses) in a calendar year?

Question 2 : Do you have any evidence as to any benefits and impacts as a result of introducing the additional number of days for temporary uses to take place since April? If yes, please specify.

Question 3 Do you have views on whether there should be additional restrictions on the use of this PDR to mitigate against potential impacts of making this permanent? If yes, please specify.

NFU Cymru would support that the additional days granted by Class A of Part 4A be retained permanently, permitting temporary uses to take place for up to 56 days in a calendar year.

We are aware of a number of our members who have taken advantage of the additional 28 days in 2020 and 2021 in relation to campsites on their farms. We believe that this has been to the benefit to the farming business and also local communities who will have benefitted from additional tourists



staying in and spending money in the community. We are not aware of any negative impact of the move from 28 to 56 days so would support the move to make this change permanent.

We would highlight that for farmers operating under the current 28 rule and considering taking advantage of this amendment then they will need to consider the implications for their farming business if they are currently claiming the Basic Payment Scheme (BPS) on that land. Under BPS rules there are a number of what are classed as Category 2 activities, that include caravan and campsites alongside other activities that include festivals and events and car parking that are permitted for up to 28 days on land and BPS can continue to be claimed on that land. If the land was used for more than 28 days, then that land would not be eligible for the Basic Payment Scheme and would need to be removed from the claim. We would request that any communication to farmers around the change to permitted developments also includes communication to make them aware of the need to consider that using the land for a permitted development can impact on their ability to claim BPS support on that land.

Question 14: Do you agree greater flexibility should be provided through permitted development rights to accelerate the rollout of electric vehicle charging infrastructure? If not, please provide your reasons for disagreeing

NFU Cymru agree that greater flexibility should be provided through permitted development rights to accelerate the rollout of electric vehicle charging infrastructure. There is an extreme lack of electric vehicle charging infrastructure across vast tracts of rural Wales that severely hampers the ability of rural road users to consider electric vehicles as an alternative / replacement to petrol and diesel cars. New permitted development rights that facilitate the rollout of electric charging infrastructure throughout Wales is to be welcomed. These changes may also provide opportunities for some farming businesses to consider electric charging points as a diversification venture.

We would hope that moving forward consideration under permitted development regulations could be extended to other infrastructure that may be needed to support our drive to net zero – for example infrastructure to house battery packs to store energy from renewable sources to feed into the grid when required.

Question 15: Do you agree with reintroducing permitted development rights for the protection of poultry and other captive birds?

Yes, this appears to be a sensible proposal to ensure that poultry keepers are able to do their utmost to protect their flock and comply with Avian Influenza controls without fear of falling foul of planning rules.

Over the course of this autumn and winter 93 cases of avian influenza have been confirmed in the UK, with 3 cases in Wales and a number close to the Border. This is now the largest ever UK outbreak of avian influenza (prior to this the largest number of cases was 26 cases in 2020/2021 and 13 cases in 2016/2017).

There is evidence to suggest that we will see continuing cases over future years and the need for temporary housing will be an important part of disease control so permitted development rights for the protection of poultry and other captive birds is to be welcomed.