



Our ref: GMP
Email: [Redacted]
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Date: 15th June 2021

Dear Wrexham Borough Council,

RE: P/2020/0363 planning application

I am writing to you on behalf of NFU Cymru to express our disappointment in the rejection of planning application P/2020/0363, Five Fords, Wrexham - hub for future low carbon fresh food production.

The proposals present a unique opportunity for Wrexham and indeed North Wales to be world leaders in low-carbon Horticulture making use of valuable resources that would not otherwise be utilised. Using by-products from the five-fords waste-water treatment works to heat state-of-the-art greenhouses that will grow high wire crops is indeed a glimpse to the future of food production and climate change mitigation.

It is understood that one of the main points of refusal stem from 'the use of a nationally significant area of good agricultural land for commercial use'. This is not the case as Horticulture as of Section 336 of the Town and Country Planning Act 1990 defines 'agriculture' as including: 'horticulture, fruit growing, seed growing, dairy farming; the breeding and keeping of livestock (including any creature kept for the production of food, wool, skins or fur, or for the purpose of its use in the farming of land). It is also true to state that the green-house structures are not permanent and so should land become scarce in the future for food production it can be reverted.

The opportunities that this project would provide are many and include using world leading technology to produce low-carbon food. It is becoming more and more apparent since Brexit and Covid-19 pandemic that we cannot solely rely on imports but we as a nation have developed an appetite, and have become accustomed, for all foods being available all year round.

The site would also create employment for around 150 people something that would be hugely valued in the area. It could potentially also provide a platform for younger people in the area to start their careers and develop skills – a relationship that has already been established with land-based higher education partnerships. Developing the younger generation is something that we as a Union are hugely passionate about and being able to provide them with the tools to enable them and the industry to thrive.

The Welsh Government views horticulture businesses as an area to expand within Wales and is working with producers towards a sustainable horticultural industry that helps to service a range of economic, environmental, and social needs. This project certainly meets all the requirements Welsh Government has set out in their Strategic Action Plan focusing on key issues like sustainable development, training, improving business performance and efficiency, and constantly enhancing the quality and reputation of Welsh produce. The scale of the project will also look to improve the efficiency of the supply chains ensuring a sustainable production of fruit and vegetables in Wales.

NFU Cymru and the NFU have set the ambitious goal of reaching net zero greenhouse gas emissions (GHG) across the whole of agriculture in Wales and England by 2040. This is the agricultural contribution to Welsh Government's ambition of net zero by 2050.

Based on the latest scientific evidence, the NFU Cymru approach has been discussed with the Committee on Climate Change, so we believe our aim is challenging, but attainable, given the right incentives. To achieve our aim, we will need a range of measures that fall under three broad headings:

- Improving farming's productive efficiency.
- Improving land management and enhancing land use to capture more carbon.
- Boosting renewable energy and the wider bioeconomy.

The project in Wrexham proposed by Low Carbon Farming has, through their design, met with all three of the measures that NFU Cymru have identified. While reducing the impact on climate change, this project has not forgotten its role in producing high quality, affordable Welsh food. Wales must not achieve its climate change ambitions by exporting Welsh production, or our greenhouse gas emissions, to other countries. The future challenges to our global food production system are now well documented.

We submit that this proposal should be re-considered due to the opportunities it provides the area and North Wales using a model that could be emulated in other appropriate locations. On-farm diversification and nutrient mitigation is a crucial issue for our members currently and we hope to be able to work with local authorities and Welsh Government to find these opportunities.

Yours sincerely,

Gwawr Parry

NFU Cymru County Adviser