

Feedback on the consultation on the National Development Framework

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We welcome the chance to contribute to this crucial discussion.

The topic needs to be addressed in the context of other Welsh policies and legislation, such as Planning Policy Wales, TAN6, the Environment (Wales) Act and the WBFGA.

Wales has an aim to reduce its ecological footprint to 'one planet' level from the current three. We believe this is an opportunity to steer governance in Wales, particularly over land stewardship, in the right direction. We are hopeful to work with Welsh Government towards this aim.

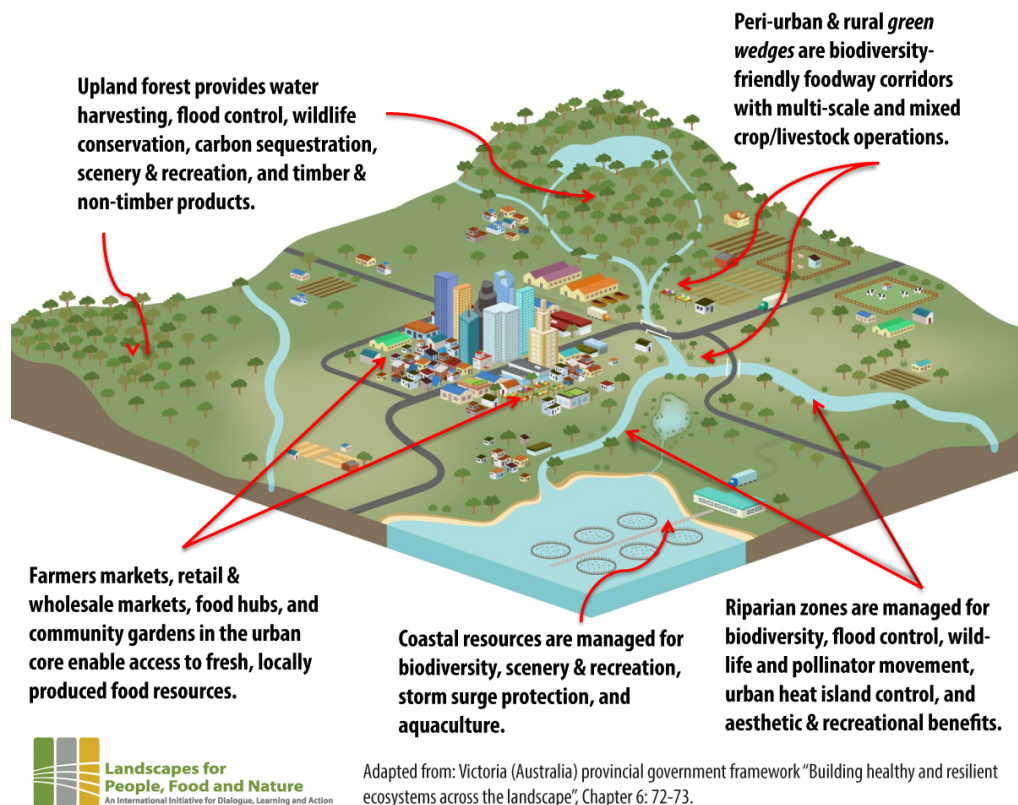
Other issues facing rural Wales up to 2050 involve the economy, agricultural diversification and the need for affordable housing. Tackling all four of these together would promote regeneration of land that in the future will be expected to provide more food for the urban areas of Wales.

Therefore we advocate using the National Development Framework and Joint Governance Committee approach to develop sustainable food provision for Wales using a hinterland approach in combination with encouraging One Planet Communities.

It may be ideal not to have a 'one size fits all' division of Wales into regions for all administration topics. Instead, we believe it right to encourage authorities to consult and engage in dialogue with each other and the communities concerned on particular issues that, for reasons of geography, land use, service provision or social need, are held in common in trans-boundary areas of land under their joint administration. For example, Ceredigion, Powys and Carmarthenshire already do this under the Cambrian Mountains Partnership.

Communities like Moelyci and Newtown Council already take on board elements of One Planet Development. They pick and mix to achieve what they can within a complex world with far too many barriers.

Land management, food provision and one planet development can be tackled together better at this scale. A hinterland approach which sees the rural areas of Wales as providing services to the urban areas can give rise to a model as illustrated in the following picture:



This can only happen if local authorities are encouraged in the Framework to cooperate synergistically to this end.

On affordability of housing, there is a huge barrier presented by land prices to its provision. Therefore we recommend that Councils are encouraged in the Framework to use their powers to set planning permission conditions, or use a stronger definition of rural exception sites, or use asset transfers at a below-market price of their own land, to support the sale of land close to existing settlements. Sale should only be permitted to non-profit groups such as charities, co-ops, social enterprises and Community Land Trusts. Associated planning conditions would favour low impact and affordable housing on 'one planet' principles as encouraged under paragraphs 4.5.3, 4.6.4 and 4.6.8 of Planning Policy Wales.

The use of rural exception sites to promote sustainable rural jobs and homes is already encouraged in TAN6 para 3.1.3, but councils do not currently tend to do this. This would also be in keeping with TAN6 para 4.15.2:

"One Planet Developments may take a number of forms. They can either be single homes, co-operative communities or larger settlements. Where One Planet Developments involve members of more than one family, the proposal should be managed and controlled by a trust, co-operative or other similar mechanism in which the occupiers have an interest. "

TAN6 allows for OPDs to be on the edge of settlements or within them, but does not define the criteria. The planning conditions for this type of larger OPD have yet to be defined. This Framework represents an opportunity to specify this definition. Guidance – currently only given for One Planet Developments in the Open Countryside – is needed to give practice and form to the following ambition stated in Planning Policy Wales (2016):

4.5.11 "Closely aligned to the commitments to tackling climate change is the Welsh Government's approach to reducing the ecological footprint of Wales. Our Sustainable Development Scheme sets out an ambition for Wales to use its fair share of the Earth's resources, where, within a generation, our ecological footprint is reduced to the global average

availability of resources – 1.88 global hectares per person. The current footprint shows that, if everyone on the Earth lived as we do, we would use 2.7 planets worth of resources. Reducing Wales' ecological footprint will require a large reduction in the total resources used to sustain our lifestyles. The policy and guidance set out here in PPW will make an important contribution to reducing our footprint, whilst delivering sustainable development and tackling climate change."

The last, 2015, update on Wales' ecological footprintⁱ states:

"The people of Wales currently represent approximately 0.04% of the world population (assuming Welsh and World populations of 3 million and 7 billion respectively). Therefore, Wales should aim to live off 0.04% of the resources that the world can sustainably provide; currently it consumes around 0.14%. In 2050, the global population is forecast to grow to 9 billion, an increase of close to 30%, whereas Wales' will remain relatively stable. Therefore, in 2050, to achieve One Planet Living, Wales will need to live off a correspondingly smaller share of the world's resources."

It adds:

"Most of the greenhouse gas emissions associated with Wales' carbon footprint occurs from purchases of domestic goods and services. Therefore the priority should be to improve both the efficiency of production and size and type of consumption within Wales."

We believe the above recommendations would support this.

In terms of land use and carbon emissions, the Framework should reward and encourage practices which increase the amount of carbon in the soil. Agricultural practice of this sort needs greater recognition and support to help Wales meet its climate obligations.

Finally, there is a vital and urgent need for much more training of officials and councillors in understanding the policies and their implications. They need concerted encouragement to work together towards the above aims by jointly setting and enforcing a series of gradually more strict targets. This can incentivise innovation to support a healthier, happier population.

ⁱ conducted by the Stockholm Environment Institute, available at:

<http://gov.wales/topics/environmentcountryside/climatechange/publications/ecological-footprint-of-wales-report/?lang=en>