

Submission of Evidence Form – National Development Framework

Name

CLA Cymru

Contact details

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Date

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Title of evidence

CLA Cymru Response to the National Development Framework Consultation

Summary of evidence

These general comments reflect the request set out in the call for evidence for respondents to explain why the CLA is submitting evidence; what national issue that the CLA response relates to; how the CLA response should be used to shape to the emerging NDF; and how the CLA submission relates to the well-being goals.

Summary of key issues/conclusions

Why have you submitted this evidence?

CLA Cymru represents 3200 members in Wales. Our members are individuals, businesses, charities, farmers and estate managers, who collectively manage and/or own over half of all rural land; indeed they represent some 300 different types of rural businesses. They generate jobs; provide land and buildings for investment, and housing for local people as well as producing food, fibre and a whole range of land-based environmental services. They also manage and/or own a quarter to a third of *all* heritage, so that the CLA is by far the largest heritage-owner stakeholder group. Most objectives for rural Wales - economic, social, cultural and environmental - rely on landowners and managers for their success, and frequently bring them into contact with the planning system, thus the CLA has a *locus* on such matters.

How should this evidence inform the development of the NDF?

The CLA's submission is supported by the evidence provided by the CLA's

3200 members. CLA members businesses support the delivery of jobs, homes and recreation and tourism in rural Wales. This submission is crucial to delivering the correct spatial policies for rural businesses, communities and environment in Wales.

How does this evidence and any actions it recommends help achieve the 7 well-being goals?

All people living and working in rural communities have the same needs for jobs, homes and services as those living in urban areas. However, delivery against the Well-being goals requires for an approach that can be applied across Wales, with knowledge and appreciation of the different needs of rural communities and an understanding of the potential costs in delivery in a more sparsely populated environment. The CLA is uniquely placed to offer such an insight into the development of the NPF

The NDF must restate the definition of sustainable development as set out in the Well Being of Future Generations (Wales) Act 2015 – taking a balanced approach to the economic, social environmental and cultural wellbeing of Wales for now and future generations.

Planning Authorities, will of course also be bound by the Well-being Duty as set out in the same legislation. The NPF should set out how it intends to do this in reference to the planning function in Wales.

In addition, the NDF should include a presumption in favour of the Sustainable Development principle and Well-being goals as set out in the above legislation and how it can override out-of-date, indeterminate or non-existent local planning policies.

Finally, the NDF should be explicit in how it intends to take account the new ways of working. Taken together, these offer a new approach to decision making which have previously been less obvious when it comes to decisions made in the planning sphere.

Why is the evidence of national significance?

The CLA response relays a number of national issues as it explains the CLA's approach to supporting rural communities in Wales.

1. Natural Resource Management

The NDF must take account and dovetail with the Environment (Wales) Act 2016. Key to this is moving away from a traditional view of development to looking more holistically in a way that enables the planning system to contribute to Welsh Government priorities to deliver the sustainable management of natural resources over the next five years.

The interim Natural Resources Report, published by Welsh Government in 2015, identified a number of priority challenges to be addressed:

- Safeguarding and increasing carbon stores
- Maintaining our productive capacity
- Reducing the risk of flooding
- Improving health and equality through access to good quality green spaces
- Improving the quality and maintaining the availability of water
- Improving the quality and connectivity of our habitats
- Retaining the distinctiveness of our places and historic landscapes

CLA have responded to the recent consultation suggesting that these are relevant, but have also noted that the statutory priorities should include a statement that recognised that having a **competitive sustainable production agriculture sector in Wales** will assist in delivering against many of the challenges identified above as this is important for the overall strength of the rural economy.

Ensuring that the planning system supports this is also essential. It is important to stress that for this approach to be successful, legislation and regulators need to have more regard for private landowners. 80% of land in Wales is privately owned and for the government aspirations to deliver against these are to be met, there needs to be more recognition (and support) for those who are uniquely placed to deliver. At a national level, planning policy needs to be open to innovation and to support land based businesses adapt to invest in the opportunity to deliver these national priorities.

An important element of the Natural Resource Management approach is the integration of forestry and woodland into land use policy. Woodlands and forestry offer a range of benefits much valued by the public and policy makers alike. Woodlands contribute to the landscape, habitat for a range of wildlife and plant life, water and carbon management, but also make an important contribution to the local economy.

In a world where the effects of carbon emissions are central to all policy decisions, the role of forests and woodlands in sequestering carbon and mitigating climate change is recognized and universally appreciated. This happens either through the function of the woodland or through the use of forest products for energy substitution – biomass for fossil fuels, or in material substitution, using timber instead of concrete, brick and steel. The NDF must proactively support the planning of forestry as a priority.

Our natural resources also provide many business opportunities especially in the field of renewable energy. CLA supports a vision of local energy generation where communities are fed by local supplies thus improving the sustainability of the people and businesses in our rural areas. It is important that the NDF acknowledges the opportunities of such enterprise and does not unnecessarily hamper development on issues such as these that deliver Welsh Government's green growth vision.

2. The Bigger Picture – Green Growth and Economic Development

Welsh Government has indicated its aspiration to deliver rural economic development via Green Growth - fostering economic growth and development which is socially equitable and ensures the sustainable use of the wealth of natural resources for the benefit of current and future generations. To deliver this, a proactive approach to rural economic development needs to be taken in the context of planning, particularly in recognizing the importance of supporting currently uneconomic agricultural enterprises as a mechanism for continuing to deliver public benefit outcomes.

Whilst agriculture and forestry continue to be the backbone of rural areas, there is no doubt that these areas have changed from places of primary production to become associated with a complex range of product and service activities. They now host a wide range of commercial activities, representing all sectors of the Welsh economy and CLA members are at the forefront of this change. Whilst the overall sectoral mix of businesses is broadly similar across rural and urban areas, the context in which they operate can vary significantly from those found in an urban setting. In general terms there are more businesses in rural areas (pro rata per head of population) and a significant proportion of these businesses will tend to be smaller scale in terms of numbers of employees and turnover. Planning policy must recognise that small developments can have significant impact on the viability of rural communities.

The CLA commissioned The Rural Business 2030 Report, *Unlocking Investment, Unlocking Potential* reveals that landowning businesses in rural England and Wales – 96% of which are family businesses – are currently investing more than £13 billion a year – and £1 billion in Wales - and there is potential for this figure to increase. It also painted an optimistic picture about the future with more than 80% of landowning rural businesses planning to make investments for business resilience and growth. Such investment creates and secures vital jobs in the rural community. Unfortunately, the research also highlighted that the planning system was the biggest barrier to further investment.

The NDF should not unnecessarily constrain economic activity in rural area and it must attempt to move away from the current unbalanced economic growth and deliver real productivity gains in rural areas. It must positively shape local, regional and national markets so they are competitive and receptive to new entrants and it must encourage investment in new technology, new skills, infrastructure and other capabilities in the economy including increased productivity and new jobs in all rural areas, irrespective of whether they are designated or not.

3. Designated areas and protected areas

Illustrating that the boundary between economic development and Natural Resource Management is narrow, the CLA recognises the important contribution designation (National Parks and AONB's) makes to the local economy in providing an attractive landscape where people want to visit, work and live. These landscapes also offer public goods to the wider society which

should act as a window to the rural community - important in raising awareness of agricultural and land management practice and food production. This window provides opportunities that must be explored and exploited.

However, these landscapes are highly managed, and their visual appearance and beauty depend on farmers and land managers actively maintaining them. If this was not to continue, then the conservation and reasons for creating the designation in the first instance are jeopardised.

Those farming these landscapes are often those with the narrowest margins and where challenges of economic viability are tightest and alternative sources of income are essential to maintain the business. But designations bring with them restriction, and the environmental considerations often overrule the commercial and economic decision-making process which places these businesses under unfair disadvantage to those who are outside these artificial boundaries.

CLA supports the need for greater appreciation of the need for a balanced economy in designated areas where economic considerations are currently given greater weight in decision making. A more balanced approach will create a more resilient National Parks and AONB where economic growth can be accommodated and supports a stronger environment and vibrant, dynamic communities.

CLA awaits the forthcoming report prepared by Lord Dafydd Elis Thomas on the role of Designated Landscapes in Wales and hopes that in the long term that a more balanced approach can be taken to development in these areas. Designation should be a catalyst for innovation not a barrier for development.

4. Sustainable and thriving rural communities

Rural Housing - As we have already mentioned above, rural Wales support a number of economic sectors including primary industries, tourism, food and drink etc. Growth and investment in these sectors relies on people being able to live and work in close proximity – we do not wish to see what is happening today; people having to live in urban areas (because housing is more readily available) and commuting to their jobs in rural areas.

A large number of rural villages could be considered to be unsustainable today (because they have lost younger people, public transport, doctors surgeries, schools, pubs and post offices) and thus planning authorities prevent new housing development from taking place. The only way of returning to sustainable and thriving communities is by allowing new housing developments of a scale, type and tenure that is appropriate to the particular place. By providing this new development, it is then possible to start making the case for services to return too in the future. The NDF must not unnecessarily constrain the construction of appropriate new homes in rural towns, villages and hamlets. There is a continuing need for new housing of all types and tenures The use of the Rural Exception Site policy and cross-subsidy must be enshrined in the NDF. The Welsh Government must actively

work with land managers and rural communities to identify innovative approaches to delivering new rural housing

The NDF should reflect the fact that more people will want to live and work in rural Wales as digital infrastructure and opportunities for remote working and new enterprise continue to grow.

Rural Traffic- Transport policies have an important role in facilitating development and contributing to wider sustainability and health objectives. Smarter use of technologies can reduce the need to travel. The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel.

However, the Welsh Government must recognise that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. The lack of public transport in rural areas must not be used to unnecessarily constrain beneficial economic activity in rural areas.

Whilst the NDF can aspire to deliver more public transport in rural areas, it will take time to achieve. In the meantime, the NDF must take account of the fact that public transport is minimal in rural areas as a whole and thus it must recognise that it is not realistic for public transport, walking or cycling to represent a viable alternative to the private car for all journeys.

Heritage - CLA members own and/or manage the largest number of listed buildings in Wales. The NDF must recognise the significance of heritage assets being properly and proportionately taken into account in national, strategic and local plan making and in development management decisions. Planning policies should ensure the long term future viability and sustainability of heritage assets. The NDF must provide for conservation of heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.

Do you agree for your evidence to be made public? (Only evidence that can be made public will inform the development of the NDF)

Yes