

# Ymgyrch Diogelu Cymru Wledig Campaign for the Protection of Rural Wales



Cyfarwyddwr    Director    Peter Ogden

Planning Policy Branch'  
Planning Directorate  
Welsh Government,  
Cathays Park,  
CARDIFF  
CF10 3NQ  
February 26<sup>th</sup> 2017

Dear Sir / Madam,

## **Consultation on National Development Framework Response by the Campaign for the Protection of Rural Wales (CPRW)**

### **1. General comments**

1.1 As a pan-Wales landscape charity seeking to ensure that land use in Wales is guided in a manner which protects the intrinsic values of all the nation's landscapes and seascapes, CPRW welcomes the opportunity to respond to this important consultation statement, the outcomes of which will have direct implications upon our charitable objects.

1.2 Our desire to guide the way Wales' landscapes are used sustainably so as to protect and enhance the resilience of those natural and cultural values which characterise the relationship people have with their "bro" are well known. Equally is our desire to see a planning system which safeguards and improves the quality of life for those who live in or depend on the rural areas of Wales.

1.3 We therefore believe the role of the National Development Framework in achieving these two outcomes is crucial. We look to this Framework to eventually articulate the importance and value of these relationship in a clear, positive and ambitious way.

1.4 In responding therefore to the initial National Development Framework consultation we therefore look for clarity and certainty as to

- how the place based relationships which characterise the distinctiveness of the rural areas of Wales are articulated. We anticipate this document framed in a way which not only recognise and seek to meet the specific needs of rural Wales (which covers over 85% of the

land are of Wales) but also expresses the relationship between and dependency of urban areas with their rural counterparts.

- how any strategic national planning approaches ensure the continued integrity and distinctiveness of the environment of the Welsh countryside and optimises the benefits its high quality values provide for public wellbeing in the future.
- how the trademark qualities of excellence, diversity and resilience characterise the underlying ethic of the NDF and are applied to infrastructure decision making in rural areas to ensure that all Welsh landscapes and seascapes maintain their unique distinctiveness.

1.5 These goals we believe, can only be achieved if the NDF recognises the need for and positively embraces a creative, integrated and bespoke **“place based landscape approach”** to planning in both rural and urban areas.



1.5 For this to be the case, such an approach must acknowledge the fundamental prerequisite that every part of Wales possesses individual but often very different qualities and values and therefore has differing potential and limitations in terms of how its resources can and should be used in the future. The NDF cannot therefore encourage “a one size fits all” approach to the future environmental, social and economic prosperity of Wales.

1.6 We therefore believe, be it in either an urban or rural situation, the landscape context of that place should be

recognised in the NDF as both the “framework for change” and provide “the scope for change”. The nature of the relationships which exist between those combinations of values which give individual places their distinctiveness, therefore provide the key parameters which must to guide change. We look forward to the NDF embracing this overarching principle

1.7 With these issues in mind it is important that the eventual NDF also clearly states its relationship clarifies with and has a clear interface with objectives of the Welsh Government’s forthcoming National Resource Policy.

1.8 In particular we believe the principles and ambitions of the latter provide an underlying set of principles and objectives which should creatively guide the planning and provision of Wales' future grey and brown infrastructure, whatever their environment context.

1.9 By default the NRP should also shape the strategic thinking of PSB Wellbeing plans and likewise the work of the proposed Wales National Infrastructure Commission. These relationships will be fundamental in ensuring that land use planning and land use management approaches synchronise in an effective manner across both land and sea and deliver the Welsh Government's wellbeing ambitions.

1.10 The importance and recognition of the concept of Green and Blue infrastructure in the NDF cannot likewise be overemphasised.

1.11 We believe the NDF should promote this fundamental concept by recognising areas of national "resource and environmental importance". The Framework should spatially legitimise these special areas and articulate the principles which will guide their future use, so as to ensure the integrity of the qualities which make them nationally important are safeguarded and enhanced.

1.12 We therefore believe one of the strategic principles of the NDF should be to identify and safeguard the values of Wales' **nationally important natural resources areas**.

1.13 This "natural resource area" principle is particularly applicable to the 25% of Wales which is designated because of the international importance of their landscapes and is also applicable to the 50% of the landscapes of Wales recognised as being of high national value. The NDF should recognise these areas as fundamental components of nation's wellbeing infrastructure.

1.14 Given their importance, the NDF must therefore include of a series of headline planning principles, to guide change within these national resource areas. We foresee the land use principles embraced by the Marsden Report and the outcomes of the soon to be published Future Landscape programme as being important contributions to this framework. In particular we would anticipate a refreshed version of the Sandford and Silkin Principle to feature in this menu of strategic policy approaches.

## **2. The rural dimension of the NDF**

2.1 Notwithstanding the importance the NDF should give to the significance and benefits the landscapes of Wales provide, we are equally conscious that it must adopt and promote a different approach to planning for the sustainability of rural communities as compared to their urban counterparts.

## **The need for a different approach**

2.2 The value of rural Wales is unquestionable. 85% of Wales is rural, one third of the Welsh population live there and 1 in 6 Welsh depend on these areas for work. Annually rural Wales contributes £9 billion to our economy.

2.3 Despite their importance, a disconnect has developed between Wales' rural areas and their urban counterparts. Disappointingly the mutually supportive relationship which previously existed has been replaced by a one sided, fragile dependency. This relationship is likely to be put further under strain given the current uncertainties and potential implications of Brexit.

2.4 Despite its attractiveness, this image of rural Wales often masks some of the most economically and socially deprived areas in the UK.

2.5 Rural communities are frequently characterised by relative isolation, inadequate facilities and services, poor standards of communication and a lack of affordable housing for local people. Young people in particular are frequently disadvantaged and suffer problems of exclusion, unable to participate fully in community life. Having to travel further and pay more to participate in activities which their urban counterparts take for granted, it is not surprising that young people feel the need to move away from their home area.

2.6 Those living in rural Wales not only have higher living costs and hence need more money to exist but frequently have fewer well paid job opportunities, lower wages and less disposable income. The hidden costs of living in rural Wales means that inconvenience, hardship or dependency on others, are common characteristics of daily life. Because exclusion and poverty is often hard to see and recognise in rural Wales, it is often overlooked.

2.7 As the era of cheap fuel fades, the rationalisation of goods and services accelerates and local administrations struggle with the challenges of reduced finances, those highly dispersed rural communities are finding it increasing difficulty to function. With the rural Wales at the extremities of centralised supply chains and all the significant decisions affecting these communities being taken remotely, their integrity and wellbeing is seriously threatened.

2.8 Lost in this one-sided 'rationalisation' is the forgotten recognition that rural areas play a vital role in providing the essential goods and services upon which urban areas increasingly depend. As rural life changes, the food, fuel, fibre, clean air and water that the urban populations depend upon, can no longer be guaranteed. Neither can

continued access to the open spaces and inspirational benefits that Welsh landscapes provide.

2.9 To some this process of rationalisation is inevitable. Fewer, bigger and more remote secondary schools, hospitals and superstores and services, combined with seriously escalating fuel costs can however only lead to one conclusion, the closure of more local facilities, more time and money having to be spent accessing these services, greater isolation for those on low incomes poor and vulnerable and ultimately a further acceleration of rural depopulation.

2.10 We believe there is no moral or practical reason why this should be the case and those living in rural areas and managing their landscapes for the benefit of their urban counterparts, should be disadvantaged or denied access to the same basic range and standard of every day services which all people need. Securing a long term and sustainable economic and social future for rural communities in Wales must feature prominent in the ethic of the NDF.

2.11 A shift in policy is therefore needed if the NDF is play a specific role to play in achieving this change, it must recognise the true value of the rural Wales and halt the decline of rural life. The NDF must promote the principle of rural resilience

2.12 The relationship between towns and the countryside must be imaginatively rebuilt in ways which make our rural communities more resilient, more self-reliant, and less dependent on remote decision making and extended supply and employment chains.

2.13 We believe the NDF must provide strategic guidance and ensure that its framework ensures all rural communities to have reasonable access to a full range of

- Utilities including water, electricity (off-grid as necessary), telephone and reliable IT and 4G, 5G broadband services.
- Primary health care and welfare provision at all stages of their lives and healthy local food.
- Primary education in close proximity to their place of residence.
- Affordable housing and a community meeting place.
- Safe, reliable and affordable community scale transport services.

2.13 The NDF must therefore promote as a strategic principle a **“rural place based approach to sustainable living”** as an alternative to the traditional urban based growth and development model which featured so prominently in the previous Wales Spatial Plan.

2.14 This new approach must promote and enable rural Wales to be as self-reliant as possible, infrastructure development being provided which is not only fit for purpose but also fit for scale and place. It should also facilitate a “proximity principle” of provision close to need based on distinctive value added local production and rural utilisation which reflecting local needs.

2.15 This new agenda would also fully recognise the major contribution that rural areas especially the uplands of Wales make to the provision of clean air and water and the personal health and wellbeing benefits that their diverse range of natural and cultural resources and sensitively managed landscapes provide. Retaining the carbon locked in the peat, organic soils and woodlands of rural Wales, is a key to solving our climate change challenges. The NDF must address how national planning approaches will assist in this respect.

2.16 Our rural areas must also be recognised in the NDF as the bastions of Welsh identity, culture and the Welsh language and properly acknowledged for the role they play as a pillar of Welsh identity and our sense of national pride.

2.17 A move towards this socially equitable rural agenda however relies on new approaches to social enterprise and governance in rural Wales. Innovation must be driven by values of personal well-being and social resilience rather than a desire for continued economic growth. Prosperity is not necessary a product of continued economic growth. The NDF has a particular role to play in changing traditional attitudes and approaches

2.18 Without early and imaginative intervention, the prospects facing rural Wales remain bleak. Opportunities for change are however within the scope and abilities of the Welsh Assembly Government and should be a priority for it through its National Development Framework approaches

2.19 We therefore consider the NDF must

- Specifically recognise the status and needs of rural communities especially those living in the sparsely populated areas of rural Wales
- The need to adopt an alternative approach to the provision of infrastructure and service provision in rural areas to meet the needs of their communities
- Rural proof all national infrastructure proposals to assess their impact on rural areas, so as to ensure such proposals do not unfairly discriminate or reduce the level of service provision in these areas or disproportionately further disadvantage the wellbeing of those in need, who live there.

### **3. The role of the National Infrastructure Commission (NIC)**

3.1 Although the NIC is anticipated as being a body independent of Welsh Government, we believe the NDF must clarify the inter relationship between it and the role and statutory function of the Framework. In particular whether or how the NDF provides a mandate for the forthcoming National Infrastructure Commission to discharge its responsibilities.

3.2 We believe in particular that through the NDF, the NIC must pay due cognisance in its deliberations and decision making processes, to its responsibilities to safeguard Wales' Green and blue infrastructure as previously described.

### **4. Role of Strategic Plans**

4.1 Although it is yet unclear how or where any Strategic Plans are to be prepared, we suggest that the NDF should identify the geography of these important statements.

4.2 In the light of our previous comments, one or more of these Strategic Plans should cover the 85% of Wales which is rural, rather than them being limited simply to the major development and growth areas in and around Wales' major urban conurbations.

### **5. Renewable Energy Infrastructure**

5.1 In the same way the previous Wales Spatial Plan attempted to identify how Wales' Renewable Energy potential can be better harnessed, we believe that the NDF should review the consequential benefits and obvious difficulties this approach has brought since its introduction over 12 years ago..

5.2 Whilst we do not accept the legitimacy of the geography of the specific areas designated as Strategic Search Areas for the development and deployment of onshore wind energy, CPRW does not disagree that a spatial approach to the identification of how Wales' renewable energy resources can be responsibly utilised from all perspectives is not inappropriate.

5.3 If such an approach is however to be adopted for all other renewable technologies including those in inshore waters, the NDF must also carefully consider if and how these potential renewable energy areas can be serviced and the implications of transmitting the power they generate into the National Grid.

5.4 We would expect not only the NDF to set out where national energy generation developments are to be located but also the planning of their associated national energy grids. This should be expressed in a way which is no different to the planning for the infrastructure associated with the sustainable development of the nation's transport network in the future.

## 6. Summary

6.1 In conclusion CPRW therefore considers the NDF must adopt new and creative approaches which

- Recognise as a major strategic consideration, clearly define and spatially interpret, how the Welsh environment and the Natural Resource Policy in particular will contribute to the Framework's national ambitions.

This may involve identifying where nationally important environmental resource areas should be safeguarded from developments which threaten their integrity or where future water resources should be located.

- Ensure that all NDF policies are consistent with and further the Environment Act's Principles of Sustainable natural resource management and the Principles of the Wellbeing of Future Generation's Act.
- Recognise the legitimacy of the 25% of Wales designated as nationally important landscapes and their significance in influencing the manner in which national development priorities are planned.
- Link the planning and management of Wales' range of natural and cultural resources on land and at sea in a seamless and integrated way. In particular how the NDF will interface and integrate its policy approaches with those of the forthcoming Marine Spatial Plan.
- Recognise the sensitivity of the coastline given its outstanding landscape and biodiversity importance. The role of climate change in bringing forward sensitive and adaptive change at the coastline should be considered within the NDF



- Identify the spatial implications of the further devolvement of planning powers to Welsh Government in respect of major energy infrastructure and its associated decision making processes.
- Establish local processes which ensure national ambitions and local placed based planning preferences are coherently matched.

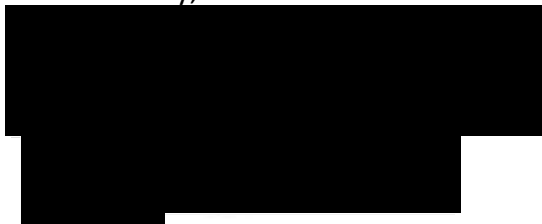
6.2 CPRW trusts these comments prove helpful in guiding the scope and content of the initial version of the National Development framework.

6.3 In the meantime, I would be grateful for your acknowledgement of the safe receipt of this submission and confirm that its comments can be made available to others if so required.

6.4 In due course I would welcome sight of your response to the representations you receive to this initial consultation and CPRW welcomes the opportunity to continue its direct engagement in the development of Welsh Government's National Development Framework, especially in the context of the rural propositions we have highlighted.

Thanking you in anticipation.

Yours Sincerely,

A large black rectangular redaction box covering the signature of Peter Ogden.

Peter Ogden  
Director