

Submission of Evidence Form – National Development Framework

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Date

7th March 2017

Title of evidence

A vision for Wales's national development framework

Summary of evidence

Wales is a small nation, with 3 million people, comprised of interesting geography, unique history, culture and language, and an economy that is characterised by its industrial heritage and its rural economy.

Wales must aim to reduce inequality through the development decisions it makes, by ensuring that the policy it sets out is firmly based on an understanding of what increases inequalities both directly and indirectly. Both the democratic deficit and inequality in general seems to be growing as reported by the media (<http://www.bbc.co.uk/news/business-32824770>).

The NDF vision must link the decision-making it governs (and influences at a regional and local level) with a nuanced understanding of the underlying economic, social, cultural and environmental issues that exist in Wales.

These complex issues will not be remedied with large infrastructure projects on a tick box “simple” basis e.g. such as a new nuclear power station on Anglesey, new M4 motorway, or widening of the A55 – but will be remedied rather for example by approving distributed energy generation and energy efficiency; better rail and investment in light rail networks as well as EV

networks; and planning housing and industrial development to align either with local needs (including using local transport) or to be accessible to public rail transport on a regional basis. These at face value seem to be more 'complex' solutions, but instead they should be considered as *intelligent* solutions, where intertwining problems need to be tackled and multiple benefits to people realised.

Friends of the Earth Cymru propose that the vision for Wales' National Development Framework sets out how big ideas based on the well-being goals will support regional and local decision-making on the thousands of 'small' changes required to deliver the big change such as carbon emissions reductions overall. The plan should assume a 100 year time frame to ensure that what is decided now is fit for the long term, rather than short term decisions.

The NDF should therefore set out:

- A vision for Wales;
- The 100 year timeframe;
- A map of the natural environment characteristics of Wales;
- Existing built environment and infrastructure in relation to place;
- How the existing built environment and infrastructure will need to be transformed for a sustainable future by 2020, 2030, 2050 and 2100;
- Strategic policies to achieve the well-being goals with targets on key issues;
- The safeguards for the heritage, language and culture of Wales in relation to development decisions.

The role and scope of the NDF

The National Development Framework should understand what is happening where on a broad level similar to the Wales Spatial Plan. Digital mapping and 'big data' tools are now more sophisticated than ever, and the Welsh Government should consider how it can incorporate data from a range of public authority sources to be presented on a digital map. From this, areas of constraint, protection and change can be identified. Each local plan should be linked into this system so that there is a visual linkage between the two.

The NDF should not just set out 'areas for growth'. That is a mischaracterisation as the framework's role is more than that. Active demand management including lowering of demand i.e. reducing growth is a key in energy and transport that must underlie a plan fit for tackling climate change. That means no more energy power stations such as coal and nuclear, and no more new motorways, but a huge upsurge in distributed energy (which would not be consented nationally) and electric vehicle infrastructure (which would not be consented nationally). The NDF's role therefore in this example is to set out the types of *shared* infrastructure that underpin the low carbon society of the future, and that local development plans therefore need to plan for and approve.

It is also a plan for a sustainable future for Wales – and that means rectifying through the planning system (as far as it is able) the problems that exist such

as rising social inequality, huge biodiversity loss and climate change. The planning system was invented in the first place to deal with social and environmental problems that arose from uncontrolled development – that is the role that this national development framework still needs to play. Setting out a vision for the future of Wales and then deciding how the development that Wales needs – including changing the existing built environment where required – is also the role of the National Development Framework.

Asset mapping should happen nationally – we should appreciate and recognise the common and public goods of Wales. Friends of the Earth has carried out asset mapping with communities to identify what they value in their community. Much work has also been done through the Wales We Want conversations which should feed into the National Development Framework, and consideration given to the Public Service Board's assessments of local well-being (for every local authority area) as a possible source of information that feeds into the mapping data and strategic policy development.

But the framework should also recognise scientific limits. There has been too much emphasis on *need* for development overriding other considerations. For example in energy setting out a “need for all types of energy development”. It is self-evident that this is neither a strategic nor a sound regulatory approach. In order to achieve a reduction in carbon emissions, a scientific approach sets out how only certain types of technology can achieve this, in a range of different scenarios. A market approach does not work, as “the market” has no coherent strategy, shared aim, overview, or understanding of cumulative impacts. A plan led approach in contrast to a market led approach, identifies preferred types of development to be delivered in preferred ways / places, in order to achieve a particular target. The NDF has to be strategic, has to make choices, and has to set out a direction of travel to achieve the well-being goals, showing an understanding of the interlinked nature of these goals in relation to place.

The NDF should set out the principal geographical and environmental characteristics; land use, type and quality; flood risk and coastal erosion; environmental protections; population and the built environment; communications, energy systems such as power grid and main inputs, transport including road, rail and national initiatives such as the coastal path and cycle paths; public service provision (schools, health); utilities (water, sewerage); common land; landscape character; heritage and conservation areas. Much of this information should be found in existing Local Development Plans where they are available. We would advocate the bottom up approach where the plans of Natural Resources Wales and local councils feed into the base map of the national development framework (and also PSBs). This is how the NDF can maximise opportunities from new development – by identifying where obvious gaps are arising e.g. the general need for upland management to slow water runoff where downstream towns and villages are being flooded if these are in different planning authority areas (adaptation).

The NDF is too far distant and too large an area to cover to provide local

democratic accountability or detailed understanding of site issues or for example the travel patterns between a specific town and its environs. Therefore the key role for the NDF is to identify the strategic policies that can then be implemented locally.

For example the NDF's role could look like this in relation to **transport**:

NDF: strategic policy to reduce the use of the private car (PPW Section 4.7 and Chapter 8) and encourage electrification; encourage cycling; identification of new rail routes

SDP: regionally significant areas of high economic activity and population density to have travel demand management plans, require ULEV charging points on significant business developments

LDP: Limit parking spaces per new development, require ULEV charging points in new developments over a certain size, require travel demand management policies for new housing and retail, reduce the use of the private car in towns through implementing pedestrianisation, car sharing and cycle schemes, cycle assessments on major developments.

In relation to **energy** the NDF's role could like this:

NDF: Strategic policy on distributed energy including upgrading the grid and identifying sources of energy supply e.g. offshore and onshore wind in relation to main users / connections, decisions on major wind projects (over 50MW), policy on promoting energy storage, setting out a new energy system architecture.

SDP: District heat networks, anaerobic digesters, cross border grid connections and constraints, regionally significant areas where storage infrastructure is required.

LDP: Making decisions on small to medium onshore wind, solar, hydro, CHP. Requiring RE and storage to be part of developments over a certain size.

The following is an example list of the type evidence which could be considered by the Welsh Government in preparing the NDF (aside from its own statistical and other information). We further note that there is duplication with the National Infrastructure Commission for Wales in examining evidence on infrastructure.

Energy and climate change

- Future Power System Architecture, 2016, <https://es.catapult.org.uk/what-we-do/fpsa/>
- IPCC special report on renewable energy sources and climate change mitigation (SRREN), http://www.ipcc.ch/pdf/special-reports/srren/SRREN_Full_Report.pdf)
- Friends of the Earth renewables report <https://www.foe.co.uk/sites/default/files/downloads/renewable-century-part-1-only-102438.pdf>
- Handling A Shock to the System, IET <http://www.theiet.org/factfiles/energy/elec-shock-page.cfm>

Natural environment

Research into blue and green infrastructure by a consortium of Universities at <http://www.bluegreencities.ac.uk/>
RSPB's State of Nature Report for Wales 2016
Landscape Institute's five principles on creating healthy places at <https://www.landscapeinstitute.org/policy/health/>

Transport

Campaign for Better Transport, 'Getting there: How sustainable transport can support new development'

The UK's Faculty of Public Health
http://www.fph.org.uk/more_cycling_and_walking%3B_less_driving,_needed_for_our_health_and_economy,_says_new_fph_report

Summary of key issues/conclusions

Sustainable communities for people and planet

Promote a pattern of spatial development that is incremental in existing towns and villages - a distributed model, rather than concentrating all new development in larger sites.

To prevent urban sprawl (particularly in the Newport/Cardiff area, Swansea, Wrexham, Broughton and Deeside locations), new green wedges and green belts should be established (Section 4.8 of PPW).

Where requirements for new homes are based on population growth within Wales, housing numbers should be based on existing and predicted demographic developments (such as growing elderly population), and the need for suitable accommodation, and the need to provide for the rented sector. Local authorities should be encouraged to build social and affordable housing, and models considered such as that for Letchworth Garden City. Building regulations should specify high standards of energy efficiency for all new houses, to avoid future fuel poverty and reduce carbon emissions from housing.

New developments that are substantial in scope should be modelled along a 'garden community' plan, with full public participation in the development of the area, mixed uses and tenures, as well as density that delivers quality as well as flexibility.

Local design codes based on local character and distinctiveness should be required to prevent a "one design fits all" approach (something which corporate housebuilders are particularly prone to, resulting in the same style of house across the entire country). This would ensure that new development contributes to the cultural and historical heritage of Wales. Welsh place names are important here as well.

Strategic policies covering these issues should be set out building on the flagship policies in Planning Policy Wales that link to the wellbeing goals such as One Planet Development. Paragraph 4.3.1 of PPW must be set out in the NDF.

It is imperative that no site allocations are made at the national development plan level for housing allocations. While for instance the need for better light rail links e.g. in the Newport/Cardiff/Heads of Valleys/Cwmbran areas could be identified at national level based on datasets and assessments of underlying trends in traffic generation, there can be no accompanying development decision on site specific housing development..

Energy for all

The world has more fossil fuel than we can afford to burn if we want to avoid catastrophic climate change. We need to accelerate the move away from burning coal, gas and oil towards clean renewable energy production.

The National Development Framework should set out the ambition to end coal in Wales. Outside of the plan's remit but alongside this measure should be and support a just transition for the few people who are left in this industry into work in renewable energy technologies and energy system architecture.

The first step is to reduce our energy usage through improving energy efficiency, particularly in our homes, making warm homes affordable and tackling fuel poverty. We therefore suggest that energy efficiency is treated as an infrastructure project for Wales – the simple concept that we should not waste any heat from our homes or businesses premises – that requires thousands of properties to be refurbished, benefiting all those individuals and businesses. In contrast, if Wales took the option of simply building another nuclear power station, the only ones to *profit* from that situation would be the multi-nationals. Wales must put its people first.

Wales has abundant wind, solar, tidal, wave and hydro resources. Much of this lends itself to small-scale community energy and local ownership, which has the advantage of spreading the economic benefit around, rather than concentrating it in large companies. Germany, Denmark and Sweden have understood the broader economic benefits of this approach.

Wales needs an energy transition – a move away from fossil fuels to renewables. And community renewables provide the best of all worlds – more local ownership, better jobs, security of supply and concrete action to tackle climate changing emissions from electricity generation.

The national development framework should set out the following:

- A target for reducing energy consumption in Wales as appropriate for consideration in development decisions.
- A presumption in favour of community renewable energy projects under the planning system.
- A target for Community-owned energy generation in Wales.
- A new energy system architecture which is based on distributed energy

generation and energy storage, and identifies regional areas for strengthening local grid requirements.

- Scaling up of tried and tested renewables, and introducing renewable targets for local authorities.
- Commit to doubling the 2010 electricity consumption coming from renewables by 2025 and 100% renewable electricity in Wales by 2030.
- Support innovation in renewable technology to make Wales a world-leader in the field.
- Support new technologies with the potential of developing in Wales, including energy storage.
- Making renewable energy a requirement of for new development of light industry and publicly owned developments)
- No new nuclear (including Wylfa Newydd) in Wales or other large-scale nuclear waste facilities - this is a dangerous and costly distraction.
- Set out a ban on fracking and all unconventional oil and gas exploitation in Wales.
- No more opencast coal mining in Wales.

Climate change

The science of climate change has grown ever stronger. The latest IPCC report revealed accelerating sea level rise, sea ice retreat and glacier melt, and gave us a clearer picture of the impact this is having on the world's most vulnerable communities and the increasing impact on people and nature all over the world.

The National Development Framework for Wales should set out:

- A 2050 emission reduction target in line with the latest science and global responsibilities – a 95% reduction is necessary. Development planning and decisions in Wales need to contribute to the achievement of this target, and are monitored on the cumulative impact of development decisions on emissions.
- The commitments of the Paris Agreement should be referenced.
- The need for plans and policies to set out how they will contribute to the Welsh Government's target of 40% cuts in greenhouse gas emissions by 2020.
- A requirement for a greenhouse gas emissions impact assessment of all infrastructure projects.
- A requirement for Sustainable Urban Drainage Systems for new developments and retrofit, together with green and blue infrastructure contributions
- No building on floodplains at risk or areas of coastal erosion.
- Avoidance of associated flood risk areas and retrofit / relocation of developments that are exacerbating the issue.

Resources and environmental limits

The things we use and what goes into them are precious and should be treated as such – our global resources are not limitless. We should consider all the finite resources that go into the goods and services we use in Wales, wherever they're produced.

We support measuring this using the 'four footprints' approach – calculating the carbon, materials, water and land that's used in the production of our goods and services. We recommend that these should be included in the National Indicators for Wales, with a plan to reduce these footprints, and the National Development Framework should be assessed on its likely footprint as part of the Strategic Environmental Assessment.

The National Development Framework should set out the following targets:

- Introduce statutory recycling target of 85% by 2030
- Zero waste by 2040.

It should also apply the waste hierarchy principle and on a strategic basis discourage incineration in favour of reduce, re-use, recycle, and deal with residual waste in smaller more modular waste solutions such as MBT. Regional level plans could consider recycling facilities and shared opportunities so that there is a closed loop with resources being recycled locally (in adherence with the proximity principle) rather than being exported for treatment elsewhere. Anaerobic digestion as a technology should be encouraged in principle in the NDF, but specific planning and development control made at a local council level.

Air quality is another issue of national significance for Wales. Hotspots are well-known nationally – such as Aberthaw, Port Talbot – and the levers to address this issue is both locally-specific and in terms of investment e.g. in requiring electric charging to help the rollout of electric vehicles which in turn reduces emissions from cars. Better public transport in towns and cities also reduces the need to even take a car, and the public bus fleet should be converted from diesel to electric vehicles. Ideally, public transport should be sufficient in towns and cities, while in rural areas, the need for the car is at least mitigated by sharing and the wholesale introduction of electric vehicles.

The connection to sewerage is an issue in some parts of Wales, with the approval of developments outstripping the infrastructure to deal with the waste appropriately. Lack of this infrastructure should be identified at a regional level, and infrastructure funding secured (and recouped from private developers proportionally) in line with identified needs. At a local plan level decisions should continue to be made on housing development, but with the ability to refuse where the sewerage infrastructure is identified as being a pollution risk at the local or regional level.

Transport

The National Development Framework should set out national priorities for reopening regional lines e.g. Carmarthen to Aberystwyth, the connections between Bangor and Caernarfon, and Mold to Chester, and increasing the capacity on the existing rail routes to make them viable alternatives to car travel.

The national development framework should also set out

- an overarching strategic aim to reduce the need to travel by car in line

with PPW

- the requirement for electric car charging points on public buildings and as part of new major developments and refurbishments
- cycle assessments for road infrastructure improvements

At a regional level, the plan should be to identify strategic areas for development (excluding housing). For example, new business park and industrial development should be concentrated around train station hubs to enable more sustainable development e.g. the long-term social, economic and environmental consequences of putting the business park in St Asaph to connect with the A55 (increasing emissions, and concentrating development at an unwalkable distance from the actual centre, and leading to pressure for development in an area of flood occurrence, that is also unsuitable for large scale development giving the size and historic nature of the centre) - rather than putting the business park in to regenerate West Rhyl (area of high deprivation) and to connect with the mainline train station in Rhyl, as well as being walkable distance from shops and services.

At a local level local authorities should assess existing 30mph zones with a view to re-designating as 20mph zones unless exceptional circumstances apply. In addition new cycle routes, travel planning for housing development and improving interchanges and facilitating integration between active travel and public transport and between different methods of public transport should be a priority.

Nature for everyone

In our busy lives it's easy to overlook the importance of nature and how we need it for healthy food, water, materials, learning, health and well-being. Many people also rely on nature for their livelihoods and ways of life. The Welsh Government's Action Plan for Pollinators was a direct outcome of Friends of the Earth Cymru's Bee Cause campaign.

We propose that the National Development Framework support the roll out of the Bee Friendly scheme, including in major developments, along trunk roads and as nature corridors connected throughout Wales.

The National Development Framework should set out its own version of the Habitats and Birds Directives, in the case of Brexit, these could then be relied on as a continuation of that policy.

On principle, the strategic objective of the National Development Framework should be that the principles of access to green space are provided for all. Chapter 6 of PPW should be reflected.

On principle, the best and most versatile agricultural land must be protected at all costs from development.

The need for better agricultural land management for wildlife, as carbon sinks, as flood and water retention, and to provide homegrown food for Wales should be set out in the National Development Framework on a principled

basis.

Deregulation of planning

The evidence seems to show so far that the deregulation of planning in England has led to inequalities such as the freefall in affordable housing delivery, less money to fund services such as schools, health, green space, and ensure essential utilities; and the segregation of communities. It has also led to poor quality building.

Much of this deregulation – called “simplifying the planning system” was advocated for by the volume housebuilders and their representative organisations (for example see this press release about “regulatory costs” <http://www.hbf.co.uk/media-centre/news/view/planning-permissions-and-buyer-reservations-up-as-house-building-constraints-begin-to-ease-but-threats-remain/> and “cutting red tape” including removing important wildlife protections (<http://www.hbf.co.uk/policy-activities/news/view/hbf-consultation-response-cutting-red-tape-review-for-house-building/>).

See the following articles for media reports on how relaxing planning rules has led to public disbenefits:

<http://www.independent.co.uk/news/uk/home-news/social-housing-faces-slow-death-with-88000-homes-forecast-to-be-lost-by-end-of-decade-a6840641.html>

<https://www.theguardian.com/business/2017/mar/02/over-half-of-new-build-homes-in-england-have-major-faults>

<http://www.localgov.co.uk/Quarter-of-a-million-rented-homes-will-be-lost-by-2020-charity-says/42370>

<https://www.theguardian.com/cities/2015/jun/25/london-developers-viability-planning-affordable-social-housing-regeneration-oliver-wainwright>

We strongly advocate that Wales should not follow England’s example as it did in the recent Planning Act Wales (following the legislation that had been introduced for England) and should instead retain the clarity of purpose and spirit of regulation for the benefit of people as set out in the original concepts of planning and in line with the Well-being of Future Generations Act 2015.

How should this evidence inform the development of the NDF?

It should inform the preparation of the issues, options and alternatives stage of the Strategic Environmental Assessment of the NDF

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

A prosperous Wales - An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources

efficiently and proportionately (including acting on climate change), and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work

The evidence as above on energy, transport and waste will help to achieve these goals. The measures on energy efficiency and renewable energy reduce carbon emissions and provide much higher numbers of new employment.

A resilient Wales - A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change)

The measures suggested to protect biodiversity and enhance green and blue infrastructure, require nature as part of developments and ensure green space access for people, as well as the Bee Friendly scheme are all examples (not exhaustive) of the approach that the NDF could take to achieve this goal.

A healthier Wales - A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.

The NDF should set out requirements to enhance air quality and tackle the causes and hotspots of this issue. Good travel planning ensuring that people can walk or cycle in their daily routines must be encouraged by the NDF. But this goal is also about planning locally for place. While the NDF should set out broad principles to enhance place, and to require health impact assessments of major developments, it is for the LDP to require places to be built that enhance people's health, by ensuring safe walking access on developments, with access to green space, services, leisure and good, accessible design.

A more equal Wales - A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio economic background and circumstances).

Development should incorporate social and affordable housing rather than separating out market housing. Mixed tenures will also help to ensure that places are accessible to all. Quality build will ensure that those households with the lowest incomes do not live in the most expensive homes to run. Good design is key in terms of accessibility. Providing infrastructure from green space to schools to good walking, cycling and transport links will provide equal access for all to facilities.

A Wales of cohesive communities - Attractive, viable, safe and well-connected communities.

Transport links are essential. Safety for children and adults includes safe walking routes from home to school or to other facilities rather than car-dominated developments. Locally distinctive design codes will enhance attractiveness and people's sense of place and connection to communities.

A Wales of vibrant culture and thriving Welsh language - A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.

Access to green space, playing fields and good walking and cycling routes for the existing built environment and new developments is key. Preserving and incorporating culture and heritage in the existing built environment, and reflecting upon it through locally distinctive design codes in the new will support the unique character of Wales's places.

A globally responsible Wales - A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being

Action on climate change and reducing our consumption of resources through good planning and development decisions are essential for Wales to contribute to global well-being. The 'four footprints' approach – calculating the carbon, materials, water and land that is used in the production of our goods and services should also consider how our existing built environment, and the development that is planned for the future will impact on carbon, materials, water and land.

Why is the evidence of national significance?

Climate change and biodiversity loss are both matters on which there is overwhelming scientific evidence that is of national significance. Social inequality is also a matter of national significance.

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

Submission of Projects Form – National Development Framework

Name

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Date

7th March 2017

Interest in site

n/a

Details of landowner

All homeowners, landlords, housing associations, builders

Title of project

Cartrefi Cynnes / Warm Homes

Summary of project

- Home energy efficiency programme to carry out whole-house retrofits to 150,000 low-income homes by 2020 and planning to scale this up to 400,000 by 2025. This could be paid for using capital investment funding streams (including the Green Investment Bank) and borrowing powers.
- A minimum energy efficiency level of EPC C in the private rented sector should be implemented by 2020 - building on the landlord licencing and registration system introduced by the Housing (Wales) Act 2014.
- New houses must meet energy efficiency standards by reviewing Part L regulations to bring in zero-carbon housing from 2017.

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Location of project (Please attach location map)

400,000 homes across Wales

What consents/legislative changes are required?

Building regulation improvements Private rented sector changes Permitted development for retrofit

Consents already granted relevant to project

n/a

Public engagement to date

Campaign for energy efficiency improvements has been running for a number of years with significant public and third sector support.
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Has an environmental assessment been prepared? (Yes / No)

No, but a Strategic Environmental Assessment of such a programme would demonstrate the ability to tackle social justice issues such as fuel poverty and the reduction of carbon emissions.
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For example see:

<http://stopclimatechaoscymru.org/wp-content/uploads/2013/07/SCC+-+Cutting+Carbon+Report+final1.pdf>

Are there any site designations or constraints affecting the site?

n/a

What is the delivery timescale for the project?

2017-2020 for regulatory changes
Implementation by 2025

How would the project contribute to the delivery of the 7 well-being goals?

Making homes energy efficiency would tackle fuel poverty and the health problems associated with it, create a range of skilled and semi-skilled retrofitting jobs in communities throughout Wales and reduce carbon emissions from housing and our global footprint.

Why is the project of national significance?

The Welsh Government should not think always in terms of big bits of kit. The key to sustainability is being comfortable with outwardly complex solutions that aggregate many small projects into something very effective in terms of reducing environmental impact, cost effective in terms of investment and return and value to the economy, and deliver solutions that benefit people in Wales directly.

It's "national significance" are the benefits it can deliver at scale, and the number of people (all people living in Wales in homes poorly insulated, or for future generations who will be living in homes built now) who will be gain positive and real world improvements from the project.

Do you agree for your project and any supporting information to be made public? (Only projects and information that can be made public will inform the development of the NDF.)

Yes