

**Ecological
Land
Cooperative**

For a living, working countryside

**Cornwall Council Climate Change Development Plan
Document (CCDPD).**

Regulation 18 Consultation

Submission by the Ecological Land Co-operative (ELC)

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Introduction

The Ecological Land Cooperative is a not-for-profit community benefit society founded to support the creation of sustainable land-based livelihoods in the UK. To this end we purchase sites and secure planning permission for low impact rural enterprises and associated dwellings. The sites are kept affordable and their use tied to ecological farming enterprises in perpetuity. Our work strengthens local economies and communities, mitigates climate change, enhances biodiversity, provides healthy food and creates rural employment.

Over the last ten years we have raised over £1million in funding, had our research commended by the Research Council UK, and have been in discussion with DEFRA about our work. Amongst other things, our funding covers campaigning for policy change at a national and local level and developing guidance to assist LPA Officers in assessing Low Impact Development (LID) applications, in order to further promote sustainable land based living.

We have recently completed the purchase of a site at Upton Cross, Cornwall where we hope to secure planning permission for 3 affordable smallholdings and as such we are looking forward to engaging with Cornwall Council Planning Department in the near future. For more information on our Cornwall site please see our website (<https://ecologicalland.coop/orchard-park>).

The impact of conventional farming on climate change and biodiversity loss is well documented, as is the importance of supporting a shift to more sustainable farming practices and the provision of fresh local food (see for example IPES Food report: From Uniformity to Diversity, attachment ELC.CC.03). In addition it is important to note that small-scale agroecological enterprises also assist local employment and rural regeneration, tending against the growing prevalence of seasonal/holiday occupation and promoting rural resilience.

As such we believe it is of vital importance that the Climate Change DPD encourages / is permissive towards small-scale agroecological farming and local food production.

The main issues discussed below can be summarised as follows:

- Response to questions 21 -24
- Policy suggestions

Our submission includes the following documents:

- ELC.CC.01: Cornwall Council Response Form
- ELC.CC.02: Our Submission (this document)
- ELC.CC.03: IPES Food report: From Uniformity to Diversity

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- ELC.CC.04: Greenham Reach Year 4 Monitoring Report
- ELC.CC.05. Small Farm Profits

Questions 21 - 24

The section of the Regulation 18 Climate Change DPD that is most relevant to the work of the ELC and, in our view, of significant importance in addressing the climate crisis is section 11: Agriculture and Rural issues. As such we have answered the questions relating to that section below.

21. Have we picked up the right issues – are there any more that you would add?

The CCDPD scoping report picks up on some key issues, notably the impact of agriculture on GHG emissions. However we believe the section would benefit from addressing the importance of small-scale agroecological enterprises in reducing not only agricultural GHG emissions, but also reducing wider GHG emissions through the provision of fresh local produce and creation of more sustainable rural communities.

22. Is the policy approach that we're suggesting about right – is there anything missing?

Policy 7: Housing in the Countryside is not referred to and in our view this is a significant omission. The lack of suitable affordable homes in the countryside is a significant barrier to new entrants to farming and as such addressing this issue could facilitate the creation of more agroecological small holdings to provide fresh, local, low carbon produce in Cornwall.

As such, in our view this section should include building on the policy approach to Rural Enterprise Dwellings (RED) – Policy 7: Housing in the countryside, to ensure that it is bought inline with the zero carbon, climate change agenda, by encouraging small-scale, agroecological local food producers.

This would involve ensuring that the policy and /or the supporting text is directly applicable to small-scale agroecological enterprises not just conventional agriculture. This could include, for example, overt recognition of the economic viability of small-scale farming enterprises and their environmental & social benefits as well as noting the importance of living on site to the viability of such enterprises, which are by necessity labour intensive.

Additionally, we are uncertain of the benefits of, where planning permission is required, supporting the conversion of farm buildings to residential and other uses subject to 100% renewable energy. Whilst we encourage support for 100%

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renewable energy on new development, this appears to be a de facto extension to Class Q PDR and is likely to have a similar effect of increasing the price of small plots of land with farm buildings on. This has already made it prohibitively expensive for many new entrants to farming to access land with existing infrastructure. Keeping agricultural land and buildings within agricultural use can also be an effective long-term policy to promote resilience in a world that is under going much change and insecurity

23. Do you support a 'One Planet' approach – should this justify exceptions to policy?

We support the One Planet approach and believe it is a positive, progressive and important policy for creating a more sustainable future. The strict criteria ensure the development is low impact and either enhances or does not diminish environmental quality and as such provides suitable justification for exception to policy.

However, in our view this should be provided alongside changes to RED policy, not in place of it, as not all small-scale agroecological enterprises will necessarily fit the OPD criteria but they are of significant importance in achieving a zero carbon future.

It may be of interest to note that we are currently applying for an OPD permission on our site in the Gower, to establish 2 OPD agroecological enterprises and associated dwellings.

24. Is there anything else that should be included in this thematic area?

As above (see answers 21 and 22)

Policy Suggestions

We would encourage any policy that promotes the importance of small-scale agroecological enterprises. This could include the following:

- Adding to Policy 7 to ensure it is supportive of agroecological smallholdings. For example, providing a definition of “essential need” which includes an acknowledgement of the viability of small agroecological enterprises and of the importance of living on site for the viability of many of these enterprises
- Providing support for development on agricultural enterprises on holdings under 5ha, similar to PD currently provided for those over 5ha.
- Inclusion of other policy to encourage local food provision, which would acknowledge the contribution of local food provision to a carbon neutral future and the economic and cultural resilience of rural economies.

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- Strengthening agricultural ties so that agricultural land remains in agricultural use to provide food and produce for local communities.

Conclusion

We are thoroughly supportive of Cornwall Council's ambition to work towards carbon neutrality in 2030 and first and foremost, believe it is important to congratulate the council on its pro-active stance. We would, however, suggest that the council takes the time to consider including more policy to directly encourage sustainable agricultural practices and local food production, as we believe this has a key part to play in addressing climate change and achieving a transition to a carbon neutral future for communities.

For our part, we look forward to working towards this goal, with the council, in the future.

Kind regards,

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