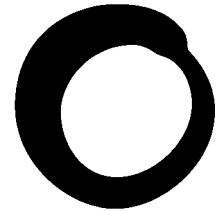


June 2011



**Friends of  
the Earth**

# **Local Development Frameworks**

## **A Campaigner's Guide**

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## About this guide

This guide is designed to provide information and advice on participating in the planning system through Local Development Frameworks (LDFs). It sets out the basics of what LDFs are all about and how you can get involved in their preparation. The second section explains what should be in LDF policy in some more detail, and provides some examples of 'good' LDF policies.

## Why is it important to participate?

The English planning system is rather confusing and you might be thinking "why bother?" But the planning system will shape your local community and have a major impact on your environment and your quality of life. It is absolutely vital that you engage in the system to ensure that local development is driven by community needs and to ensure that the 'goods' and 'bads' are spotted and dealt with accordingly.

## The land-use planning system

Most people think of the planning system in terms of individual decisions taken when somebody wants to build something. These decisions however are taken in the light of a huge body of national and local policy. So there are very good reasons to get involved in deciding this policy – the development planning system – before it gets to the stage of an individual planning application, by which time it may be too late.

There has been an almost constant process of reform of the planning system over the last decade, and its ongoing now:

- Regional Strategies (RSs) setting out policies relating to the development and use of land for each English region. They cannot be site specific but contain broad policy statement of how much of what might go where, for example housing numbers and retail capacity. The Localism Bill 2010 removes regional strategies and replaces them with the duty to co-operate (due to become law in 2012).
- Local Development Frameworks (LDFs) are set by local councils: either unitary authorities, or district councils in two-tier areas (where there is a county as well as a district council). They add local detail and are a lot more specific in saying what can happen in the local authority area and where it can happen.
- New Neighbourhood Plans and Development Orders are introduced by the Localism Bill 2010 and will install a smaller than local authority level of planning. They have to be in line with LDFs where they exist.

Taken together, these are called the development plan for an area. If a proposed project conforms to the development plan then there is a legal presumption that councils will allow it; if it doesn't then they have grounds to refuse. It isn't as simple as that of course and much depends on the interpretation of policies in development plans, which is why it is so important that they are well written in the first place.

### Check!

The Coalition Government have made an announcement to put in place a "presumption in favour of sustainable development. This essentially means that where there is no plan in place, if a developer puts in a planning application, for example for a housing development or supermarket, that the local authority will have to approve unless there are very strong reasons not to. Developers will be able to apply speculatively, and this could threaten environmental sites and town centres.

The flow chart on page 5 gives you a picture of how the new system fits together. It might look mind bogglingly complicated. Hopefully this guide will help to shed some light.

## Regional Planning – a history

When Regional Spatial Strategies (RSSs) were first prepared the Regional Assembly was the Regional Planning Body. Under the Local Democracy, Economic Development and Construction Act 2009, the Assemblies were abolished and their powers transferred jointly to the unelected Regional Development Agencies (RDAs) and Leaders' Boards drawn from the Local Authorities in a region.

These bodies were then called the "Responsible Regional Authorities" and are charged with drawing up single Regional Strategies, combining the former RSSs and Regional Economic Strategies that were prepared by the RDAs. In practice this is a lengthy process and no region has yet done it, so what has happened is that on April 1st 2010 the RSSs were simply renamed.

On 6<sup>th</sup> July 2010, the Secretary of State revoked Regional Strategies. This action was subject to legal challenge, but on the 27<sup>th</sup> of May 2011 the Government was successful in ensuring that the Planning Inspectorate and local authorities must take the proposed abolition of regional strategies into account in making decisions.

The Regional Strategy was the place for e.g. putting in place renewable energy targets or looking at adaptation across local authority borders e.g. river basin management. The duty to co-operate which the Government is proposing as a replacement to Regional Strategies is weak and doesn't have defined areas of co-operation. This means that in effect there is no mechanism to ensure that climate change is tackled at a regional level.

### London Plan

London still has its London Plan which the Mayor is in charge of. Friends of the Earth's Local and Regional Campaign Co-ordinator should be contacted for information relating to the latest on the London Plan.

## Local Planning

- Local Development Frameworks (LDFs) are developed by Local Planning Authorities. LDFs have gradually replaced the old local plans, unitary development plans and structure plans.
- County Councils and some Unitary Authorities must also prepare and maintain a minerals and a waste development scheme.
- They must take into account national planning policy.

## What are Local Development Frameworks?

Local Development Frameworks (LDFs) are the folder in which local development documents sit. The LDF is meant to be based on the objectives of the Local Community Strategy. Introduced under the Local Government Act in 2000, these strategies set out the long-term vision for your local area. The Framework is intended to be a more flexible plan and will comprise of two main parts:

1. Development Plan Documents: These are local development documents and contain, amongst others, Core Strategy, Area Action Plans and a proposals map.

2. Other documents: These documents contain, amongst others, the Statement of Community Involvement (SCI), the Local Development Scheme (LDS), and Supplementary Planning Documents (SPD).

It is important to distinguish between these different kinds of document since Development Plan Documents are significantly more powerful in policy and legal terms.

Any of these documents can be in the process of writing or revision at any time, and it can be difficult for campaigners or community groups to know where they stand.

This is where the Local Development Scheme (LDS) comes in. It is a kind of timetable, setting out what Local Development Documents will be prepared, when, in what order and whether or not they are to be jointly prepared with other Authorities. Local Development Schemes should be available from all local planning authorities, and can also be found through the Planning Portal (see references at end).

The Statement of Community Involvement (SCI) will set out how your Local Planning Authority intends to achieve continuous community involvement in preparing development documents in their area. It is very important that LDFs allow for full participation of local communities in the shaping of their future, be accountable and allow for a right of redress in land-use decisions. Three questions which should be asked of a local SCI:

- Does it help people to know what is going on?
- Does it allow them to shape the decisions?
- Does it give them an opportunity to seek redress if the process lets them down?

All Development Plan Documents will have to be subject to an independent Sustainability Appraisal (SA).

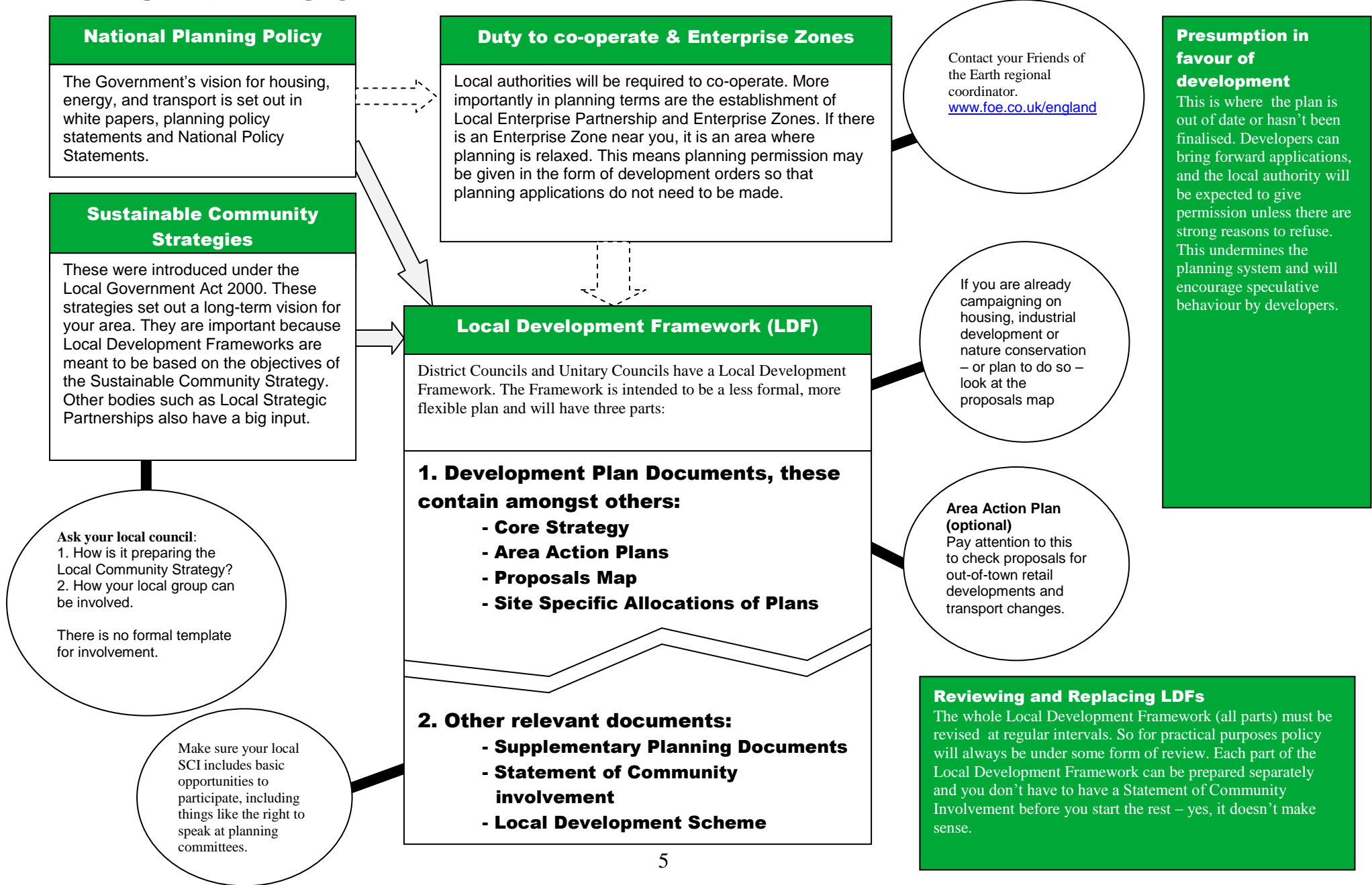
## **Public involvement**

All Development Plan Documents and Statements are subject to a Public Examination, where everyone who has made written representations has the right to turn up and be heard. However, the Inspectors report will be legally binding. The examination will determine if the development plan document is 'sound'. This essentially means 'have people been properly involved and is policy clear, concise and deliverable?'

## **Timetable of LDF preparation**

The Local Development Scheme document will lay out the detailed timetable for the preparation of the Local Development Framework. The LDF is reviewed annually and replaced every three years. Find out what the timetable is from your local authority or the Planning Portal (see references at end) and refer to Friends of the Earth's guide to Local Development Schemes.

# The English planning system and Local Development Frameworks



## The LDF preparation process in England

Stages of the LDF Process	What you can do
Council and/or Local Strategic Partnership draw up Sustainable Community Strategy	Ask your local authority how you can be involved in your local community strategy. Ask them about the Local Strategic Partnership which plays a key role in drawing up the community strategy.
Your local council will draw up a Local Development Scheme	Get hold of a copy! Also refer to our overview of LDS.
Council Planners gather evidence and come up with options	
Public participation on key planning issues and options	Make sure you take up all the opportunities for participation and help to encourage others to do the same.
Consultation	Use the Friends of the Earth Local policy guide to help you respond.
Council planners write up the final version of the draft plan	
Full Draft Plan is placed on deposit	This is your opportunity to make formal representations to object or support policy. You must do this in order to be heard at the Public Examination.
Plan Public Examination (held by the Planning Inspectorate)	This is your only right to be heard in person or make written representations.
Inspectors report	The inspector has the final say but the report will no longer be legally binding.
Plan adopted	You can seek redress by a legal challenge which is known as Judicial Review.
<i>Reporting</i>	Annual Monitoring Reports will no longer be required but your local authority should report on progress. Ask them to do this, and lobby your councillors.
<i>Review</i>	Ask your local authority how you can be involved in the development of new policy.

It is important to remember that this is your chance to get rid of the bad policies and to promote the good ones. For example, 'bad policy' may include greenbelt housing, road infrastructure, greenfield retail development. 'Good policy' may include renewable energy development, sustainable housing, promotion of walking and cycling infrastructure.

## How you can get involved

### Regionally

- Contact Friends of the Earth's regional campaigners. There is no right to be involved at the regional level in the duty to co-operate or in Local Enterprise partnerships.

## Locally

- Ask the council how it is preparing the Community Strategy and how you can be involved. Your local council needs to know your interest at the earliest possible stage.
- Get hold of a draft new Local Development Scheme (LDS) from your local council and share it with your group. This will give you the timetable and the scope of the plan.
- Find out where your council is at in writing its Statement of Community Involvement and ask them to include the major principles as set out in the Friends of the Earth Guide on SCI's.
- Look closely at the Area Action Plan to see what your local authority has identified as being 'areas of change' e.g. your airport.

Friends of the Earth is able to provide online advice via its Community website, but unfortunately is unable to provide individual Local Development Framework advice.

## Top tips on submitting responses to your local planning authority

### 1 Intelligence

In order to mount the best planning case, you need to make sure you know about the LDF process early. You can find out about LDF by:

- Checking the council web site (if they have one)
- Look at the Government's planning portal website [www.planningportal.gov.uk](http://www.planningportal.gov.uk)
- Looking out for site notices (libraries and community centres)
- Checking the local press
- Talking to local councillors
- Write to your Council to say that you are interested in knowing more about the new LDF. Request that you are kept informed of everything to do with the LDF preparation.

### 2 Building Good Relationships

- It pays to be on good terms with your local authority planners.
- Always try to meet planning officers face to face to make them aware of your concerns. They will also be able to explain local policies to you.
- It is also worth building links with other community based organisations.
- Talk to councillors too but understand their position at public meetings – getting angry with them may not help your case.
- Make sure that you have a good clear message for the media and public about the impacts that LDF proposal will have - the local media love planning battles but you do not always want to be portrayed as being negative.
- Remember that this battle could be a long one, so keep some good stories up your sleeve to keep the media interested.

### 3 Get them on their weakest points

It is important to concentrate your fire in complex planning cases. Rather than trying to say something about everything in your draft LDF, you need to work out the key areas of concern and make them into powerful arguments.

In Planning Speak, your local authority will have ultimately to prove that their plan is “sound”. The Government’s guidance on Local Spatial Planning (PPS12, see references at end) says:

### “Soundness”

To be “sound” a core strategy should be justified, effective and consistent with national policy..

“Justified” means that the document must be:

- founded on a robust and credible evidence base
- the most appropriate strategy when considered against the reasonable alternatives

“Effective” means that the document must be:

- deliverable
- flexible
- able to be monitored

It is worthwhile therefore to think about your evidence for a particular policy or for a response to a site allocation when making your objection to the LDF, or when talking to planners and councillors.

### **Check!**

The following policy guide is based on current national planning policy. In July 2011 the Government will publish a new draft national planning policy framework for consultation. Please check the Friends of the Earth web site for further information.

## **Local Development Policy Guide**

### **A word about planning policy**

Don’t be put off by the jargon that goes with planning policy. At heart it is all about the right development in the best place. Don’t feel you have dress up what you say in any special language. There are two top tips:

1. When you read a plan you’ll find some text in bold type. This is the key policy which will be applied by the council. Other normal text that goes before the policy explains the policy but doesn’t carry the same importance.
2. Use plain English where you can but making reference to the national policy framework (the planning policy statements) will make your submission much more effective.

## **1 Sustainable development**

Sustainable development should be at the heart of the future development of our society. It provides planning with its core purpose to enhance the quality of life of communities by promoting the highest quality forms of development in the most appropriate locations, and respecting environmental limits. Such development should seek to promote social equity over private gain and the wise use of limited natural resources to protect the interests of future generations.

**Friends of the Earth therefore suggests the following overarching policy statement be included in LDFs:**

It shall be the principal objective of this LDF to ensure sustainable patterns of development which improve the quality of life of all people, while respecting environmental limits and the ability of future generations to enjoy a similar quality of life.

In order to uphold this objective, all land use decisions will enshrine the principles of:

- **environmental justice:** putting people at the heart of decision making, reducing social inequality by upholding environmental justice in the outcomes of decisions;
- **inter-generational equity:** ensuring current development does not prevent future generations from meeting their own needs;
- **environmental limits:** ensuring that resources are not irrevocably exhausted or the environment irreversibly damaged. This means for example, supporting climate protection by reducing harmful emissions, protecting and enhancing biodiversity and promoting the sustainable use of natural resources;
- **resource conservation:** ensuring that planning decisions assist in the prudent and sustainable use of finite natural resources;
- **the precautionary approach:** the precautionary principle holds that where the environmental impacts of certain activities or developments are not known, the proposed development should not be carried out, or extreme caution should be exercised in its undertaking;
- **the polluter pays:** ensuring that those who produce damaging pollution meet the full environmental, social and economic costs;
- **the proximity principle:** seeking to resolve problems in the present and locally, rather than passing them on to other communities or future generations.

Government policy can help support your arguments. Planning Policy Statement 1 (PPS1) contains the key objectives for planning. Paragraph 3 of the new PPS makes clear that ***'sustainable development is the core principle underpinning planning'***. The paragraph goes on to use the Brundtland definition of sustainable development which emphasises inter-generational equity.

Paragraph 13 of the Planning Policy Statement sets out the key principles which ensure that development plans and decisions contribute to the delivery of sustainable development. This paragraph contains seven sub-clauses which are particularly important. The first makes clear that ***'development plans should ensure that sustainable development is pursued an integrated manner, in line with the principles for sustainable development set out in the UK strategy.'*** A new version of the UK sustainable development strategy will be published and this paragraph ensures of the contents of the strategy is now relevant to the preparation of development plans and individual decisions.

Sub clause 2 of paragraph 13 is particularly important in relation to climate change. The paragraph makes clear that ***'development plans should contribute to global sustainability by addressing the causes and potential impact of climate change - through policies which reduce energy use, reducing emissions (for example, by encouraging patterns of development which reduce the need to travel by private car, or reduce the impact of moving freight), promote the development of renewable energy resources, and take Climate Change impacts into account in the location and design of development'***.

## 2 The sequential approach

A key way of implementing the principles for sustainable development set out above is to adopt a sequential approach to development. The sequential test should be the primary of testing new development in all policy areas.

In order to achieve sustainable development and travel patterns and to protect and conserve areas of recognised environmental and amenity importance, LDFs should adopt the following sequential approach in their policy towards the identification of locations for development:

- the re-use of previously developed land and buildings (brownfield sites) within urban areas;
- on other previously developed land well connected to public transport links;
- new locations within urban areas, subject to the need to protect and conserve areas of recognised environmental and amenity interests;
- on other sites and locations which are well located to achieving sustainable development and reducing the need to travel.

To ensure that the sustainable development objectives are met and that consequently the most sustainable mix of locations within, adjoining and outside of urban areas is selected within any development plan area, the LDF should use the following criteria in establishing the suitability of individual sites:

- The accessibility of development sites by non-car modes, and the potential to improve such accessibility.
- The capacity of existing infrastructure, including public transport, utilities and social infrastructure (such as schools and hospitals) to absorb further development.
- Physical constraints on the development of land, including for example, the level of contamination, stability and flood risk.
- The impact that the development of sites will have on the area's environmental carrying capacity and in particular their implications for resource conservation, natural resources and biodiversity.
- The impact that the development of sites will have on the area's cultural resources. Local authorities should recognise the contribution of heritage features to the social and economic regeneration of an area. There should be a presumption against development which would damage sites of heritage value.
- The impact of the development on general pollution levels. Local authorities should recognise the existing problems of poor air, water and soil quality in many areas and acknowledge the potential negative cumulative impact of further development on these areas. Where significant doubt arises as to the precise impact of polluting aspects of development on human health, local authorities should apply the precautionary principle.
- The suitability of sites for mixed use development and the contribution that development might make to the social, economic and environmental fabric of local communities.

This can be described as a general policy, described in the core strategy of the LDF. It should also be seen to be applied in the issues and options stage of the LDF preparation process. Finally, it should also be part of the policy for development control.

### **3 Employment Land**

The proposals map and site specific allocations within the LDF (the development plan documents) will include the allocation of any new sites for employment. The core strategy, and/or policy guidance within the site specific allocations should follow the sequential approach as set

out above to ensure that brownfield sites are given priority over the development of greenfield sites and that strong emphasis is placed on the reuse and adaptation of existing buildings.

The LDF should make provision for smaller, flexible employment sites where these can help to diversify the local economy and lead to the development of indigenous businesses, in particular self-employed people and startups. The majority of new jobs are in smaller businesses. Local authorities should employ phasing mechanisms for the release of such sites to ensure that priority is given to sites on previously developed land. In identifying suitable sites, local authorities should have regard to:

- the sequential test, which places an emphasis on the reuse of developed land as well as a site's accessibility by public transport;
- their contribution to areas in need of regeneration and other areas of high unemployment, where it is likely that investment will be required to make the sites
- attractive to investors;
- local landscape and environmental factors;
- suitability for small business needs.

#### 4 Retail Development

The sequential approach that is already defined in government planning guidance, which favours town centre development over out-of-town retail development, is a vital component of a sustainable retail strategy. However we also believe that large format stores located on the edge of town centres can equally damage the vitality of town centres. It is essential that a threshold to restrict the development of large scale retail outlets that would otherwise damage existing retail centres is adopted (key policies are laid out in PPS 4)

**Friends of the Earth therefore recommends that in addition to the sequential approach, the following policy be incorporated into the LDF:**

All proposals for retail development will be capped at most 3,000 m<sup>2</sup> of net retail floor space in retail outlets.

In some local authority areas it will be necessary to set the cap at a lower level, for example; in areas where the aim is to protect existing, or encourage new provision of a diverse range of shops and services; in areas where a large proportion of the retail floorspace is already provided in large format stores; in local centres or smaller town centres where a large format store would not be appropriate in scale or catchment to that centre.

**Friends of the Earth also recommends the following policy be incorporated into the LDF to control retail development:**

There will be a presumption against the approval of developments above the threshold except in the following exceptional circumstances:

- where the development would have no detrimental impact on the vitality and diversity of existing retail centres. Applicants will be expected to submit a detailed Economic Impact Assessment of both the quantitative and qualitative impacts of the proposed development;
- where the applicant can satisfy the principles of sustainable development set out in the core strategy

The presumption against approval will also apply to any change of use or extension which would

result in the total net retail sales space of an outlet contravening the floor space threshold. No existing out-of-centre developments should be redefined as town centres within the proposals map or area action plans of the LDF.

### **Promoting diversity and vitality in existing retail centres**

The LDF should play a positive role in promoting vibrant, diversified and localised retail development in an area. Retail planning policy should therefore reinforce investment in urban renewal by supporting the continuing role of town and district centres. This should include the effective use of master planning, action plans and supplementary planning guidance on issues such as urban design. In assessing the need for additional retail floorspace in or adjacent to existing centres, local authorities should not simply consider the quantitative need for floorspace but should also assess the format in which the additional floorspace will most likely contribute to the vibrancy and diversity of existing retail centres.

### **Promoting retail diversity and vitality in new developments**

Growth areas provide an opportunity to put the principles of sustainable development into practice and to demonstrate the benefits of a pro-active approach to encouraging vibrant district and local centres.

LDF policy should ensure that in any significant new area of housing development, provision should be made for local retail outlets which:

- avoid an overall increase in travel;
- provide access to essential shopping facilities for those without access to a car;
- encourage vibrant and diverse neighbourhood/district retail centres.

### **Retail policy and support for the rural economy and local communities**

Planning policy has a key role to play in delivering on the Government's policies on sustainable rural economies. It should be supportive of local facilities in small to medium towns and villages which provide an effective and valuable service to the local community, particularly the elderly, disabled and those with no access to a car or those who are poorly served by public transport.

Local authorities should develop policies which provide a presumption in favour of retail developments which make a primary contribution to sustaining local food producers, and providing accessible retail facilities to local communities, including specific guidance in Supplementary Planning Guidance.

## **5 Climate Change and Renewable Energy**

**The Planning and Climate Change coalition recommend the following overarching climate change policy:**

Planning permission should be granted only where there is clear evidence that the proposal (in so far as it is capable of doing so) would:

- make a significant contribution to reducing greenhouse gas emissions; and
- make a significant contribution to reducing vulnerability and building resilience to climate change impacts.

The coalition also want LDFs to reflect clear targets on renewable energy generation and adaptation, and they should make it clear that national, European and international commitments

on carbon reduction can be directly material to planning decisions. Localised CO<sub>2</sub> reduction targets should be evidence-based and should take account of national commitments.

## 6 Housing

**The following policy should be included in the LDF:**

New housing development will be based on the principles of:

- **Social Equity:** Access to good housing is a basic human right (by delivering social housing needs through greater public sector investment);
- **Sustainable Development:** Communities which maximise quality of life and minimise resource use by operating within the environmental limits of the locality;
- **Demand Management:** The redistribution of housing demand from areas of high to low demand;
- **Urban Capacity:** By a greater sensitivity of social and environmental capacity of existing communities to accommodate new housing and of the housing needs of those communities;
- **Design Innovation:** By promoting innovation in housing design, construction and layout;
- **Participative Processes:** A planning system which places the views of local people at the heart of the planning system.

### Housing Land Provision

Friends of the Earth strongly supports the use of a sequential approach to the provision of housing land with an aim of increasing the percentage of housing development which takes place on previously developed land and the conversion of redundant buildings. Alongside this, we strongly support the use of phasing mechanisms to ensure that land allocated for development is proactively brought forward at a rate which encourages the reuse of urban land.

**Friends of the Earth recommends the following housing policy:**

The LDF aims to increase the level of housing development on previously developed land so that the target of 75% can be reached over the plan period.

Local authorities should include policies in their Development Plans which should include:

- the use of phasing mechanisms;
- the reallocation of sites for housing which are currently specified for other uses;
- requirements for higher densities of urban housing developments;
- the allocation of smaller, more distributed sites.

### Housing Density

Friends of the Earth is particularly concerned to emphasise the need for increased densities to be encouraged and recommends that minimum acceptable density levels are included as a guide in the LDF.

Friends of the Earth would also recommend a more proactive policy stance in regard to the reuse

of vacant properties and the promotion of 'homes above shops' as part of a comprehensive package to revitalise urban areas.

### **Low Impact Housing**

LDF policy should encourage new developments in housing design which combine elements of traditional building techniques with innovation in sustainable building materials, energy conservation and water and refuse recycling. The highest possible standards should be set for commercial housing developments, while low-impact development should be encouraged on a self-build basis.

### **Affordable housing**

Housing equity is a vital part of the sustainable development of an area. There is the need not just to increase the supply of affordable housing, but to ensure a range of size, types and tenures of housing to be provided so as to ensure a greater level of equity in housing provision than that which currently exists. The LDF should make a clear commitment to ensure that at least 30% of all new homes are affordable. Such targets may need to be exceeded in some areas depending on local circumstances.

## **8 Transport**

Rising traffic levels are causing major environmental, economic and social problems throughout the country. Friends of the Earth believe that the only way to tackle all the problems caused by the way we currently travel is to reduce the volume of traffic on our roads. Local Transport Plans are key here for local authorities. The contents of LDFs will be very significantly determined by what is included in these plans – eg supported road schemes will have to be included in LDFs.

LDFs should include transport policies on the following topics:

- Demand management (to restrain the level of traffic in 2015 to below the level for 2001)
- Charging (making use of the powers provided by the Transport Act 2000)
- Land use, climate change and transport integration
- Hierarchy of transport users
- Soft Measures and road safety
- Airports (including surface access schemes)
- Road-building (to be regarded as the option of last resort)
- Rail schemes
- Buses (seeking to increase bus patronage by at least 10% by 2010)
- Cycling (to meet the targets of the national cycling strategy)
- Walking

### **Hierarchy of transport use**

Establishing a hierarchy of transport use should be integrated into Local Transport Plans and Local Development Frameworks.

### **Friends of the Earth recommends the following policy for local transport plans:**

The plan will consider and provide for the needs of different modes of transport in accordance with the following hierarchy of transport users:
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1. pedestrians
2. the mobility-impaired
3. cyclists
4. public transport users
5. powered two-wheelers
6. commercial users
7. shoppers and visitors by car
8. car commuters

### **Land use, climate change and transport integration**

The major impacts of transport policies on land use and climate change require that the connection between them is controlled by a policy.

In order to mitigate the climate change consequences of transport activity and proposals, local and regional authorities, central government agencies (in relation to regional decision making) and transport operators should:

- implement policies which will reduce existing and forecast growth in climate change emissions from existing transport activity by the less sustainable modes (road and air); and
- undertake and then act on climate change impact appraisals of significant new transport proposals and programmes.

Local authorities should minimise the resource demands of transport by:

- integrating land use and transport so as to reduce the need and demand for travel;
- restricting the development of individual car travel to locations with good quality public transport; and
- by restraining inappropriate development alongside motorways and at motorway junctions.

### **Roads**

Road-building does not provide a medium or long-term solution to traffic problems. The Government has accepted that we cannot build our way out of congestion.

#### **Friends of the Earth recommends the following policy statement:**

Road-building will be regarded as the option of last resort as a solution to transport problems. Support will not be given to any road-building proposal unless it can be demonstrated that all other possible options, including non-road-building options and making more efficient use of existing infrastructure, have been fully considered and it has been concluded that these do not provide an adequate solution. An Economic Impact Report will be required for all proposed road schemes. The LDF will not commit to supporting any specific infrastructure project where this support might prejudice the outcome of a full Environmental Impact Assessment.

### **Walking**

Walking is a healthy and sustainable mode of transport that should have a key role for short journeys. A quarter of all journeys are under a mile long, and thus can be walked by most people.

#### **Friends of the Earth recommends the following policy:**

The Council recognises the potential for significant modal shift to walking for short journeys and will aim by 2010 to increase substantially the share of journeys under one mile long made on foot. This will be achieved by:

- providing direct, well-maintained and well-lit walking routes, including to and from schools;
- providing quality footways in towns and cities and Quiet Lanes in rural areas;
- slowing down traffic through the use of 20mph zones and Home Zones.

## Cycling

Cycling is seen as a minority mode of transport in the UK, but 43% of all journeys are under 2 miles long and over 60% under 5 miles long (National Travel Survey, 2002), and therefore able to be cycled by most people.

**Friends of the Earth therefore recommends the following policy for inclusion in the LDF and LTP:**

The LTP and LDF recognises the potential for significant modal shift to cycling for short journeys and aims, as a minimum, to quadruple the share of journeys made by bike by 2012, in line with the targets of the National Cycling Strategy. This will be achieved by providing a network of cycle-friendly streets and cycle routes in urban and rural areas.

## 9 Natural Environment

Friends of the Earth is deeply concerned that the intrinsic value of the natural environment is often crudely traded off against short term economic objectives. The UK Biodiversity Action Plan's objective is to conserve, safeguard and where possible enhance:

- The quality and range of wildlife habitats and ecosystems.
- The over populations and natural ranges of native species.
- Internationally important and threatened species, habitats and ecosystems
- Species, habitats and natural and managed ecosystems characteristic of local areas.
- Biodiversity of natural and semi-natural habitats where they have been diminished over recent decades.

These objectives can be realised through close co-operation and partnership between local communities and the private and voluntary sectors. They should be at the heart of land-use planning activities.

**Friends of the Earth therefore recommends the following policy statement for inclusion in the LDF:**

Habitats and species of importance for nature conservation should be identified in local biodiversity action plans and protected species surveys, and given the appropriate level of protection. There will be a presumption against any development which will damage sites of national, regional and local nature conservation value. Actions to protect and enhance the region's character and natural diversity of the countryside and urban areas should be supported by appropriate levels of resources and by giving guidance on the conservation, enhancement or regeneration through all policy instruments available, including development plans.

Management of habitat and landscapes should:

- Maintain and enhance their ecological and landscape value.
- Optimise access for education and recreation.
- Protect them from detrimental visitor impact and insensitive change in exploitation.

## Further information and guidance:

Friends of the Earth – Tel: 020 7490 1555  
 26-28 Underwood Street, London N1 7JQ  
 Website: [www.foe.co.uk](http://www.foe.co.uk)

### **Rights and Justice Centre**

Email: [legal@foe.co.uk](mailto:legal@foe.co.uk)

## Specific reading

**Community Rights Resource Pack** - This pack contains the individual guides referred to.  
[www.foe.co.uk/campaigns/fair\\_future/resource/rights\\_resource\\_pack.html](http://www.foe.co.uk/campaigns/fair_future/resource/rights_resource_pack.html)

### **Local Development Frameworks**

#### **Guide:**

[www.planningportal.gov.uk/england/public/tools/ldfguide/](http://www.planningportal.gov.uk/england/public/tools/ldfguide/)

#### **Finder:**

<http://www.planningportal.gov.uk/wps/portal/ldf?docRef=LDFSearch&scope=203&langid=0>

### **Planning Policy Statements**

Draft Planning Policy Statement: Planning for a Natural and Healthy Environment  
 Planning Policy Statement 1: Delivering Sustainable Development  
 Planning and Climate Change - Supplement to Planning Policy Statement 1  
 Planning Policy Statement: eco-towns - A supplement to Planning Policy Statement 1  
 Planning Policy Guidance 2: Green Belts  
 Planning Policy Statement 3: Housing  
 Planning Policy Statement 4: Planning for Sustainable Economic Growth  
 Planning Policy Statement 5: Planning for the Historic Environment  
 Planning Policy Statement 7: Sustainable Development in Rural Areas  
 Planning Policy Guidance 8: Telecommunications  
 Planning Policy Statement 9: Biodiversity and Geological Conservation  
 Planning Policy Statement 10: Planning for Sustainable Waste Management  
 Planning Policy Statement 12: Local Spatial Planning  
 Planning Policy Guidance 13: Transport  
 Planning Policy Guidance 14: Development on Unstable Land  
 Planning Policy Guidance 17: Planning for Open Space, Sport and Recreation  
 Planning Policy Guidance 18: Enforcing Planning Control  
 Planning Policy Guidance 19: Outdoor Advertisement Control  
 Planning Policy Guidance 20: Coastal Planning  
 Planning Policy Statement 22: Renewable Energy  
 Planning Policy Statement 23: Planning and Pollution Control  
 Planning Policy Guidance 24: Planning and Noise  
 Planning Policy Statement 25: Development and Flood Risk  
 Planning Policy Statement 25 Supplement: Development and Coastal Change  
[www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningpolicystatements/](http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningpolicystatements/)

### **Planning and Climate Change Coalition**

[www.tcpa.org.uk/data/files/pccc\\_position\\_statement.pdf](http://www.tcpa.org.uk/data/files/pccc_position_statement.pdf)

### **Planning Inspectorate and the soundness test guidance**

[www.planning-inspectorate.gov.uk/pins/appeals/local\\_dev/ldf\\_testing\\_soundness\\_feb10.pdf](http://www.planning-inspectorate.gov.uk/pins/appeals/local_dev/ldf_testing_soundness_feb10.pdf)

## Useful web sites

### Government

Department for Communities and Local Government  
[www.communities.gov.uk/](http://www.communities.gov.uk/)

The Planning Inspectorate  
[www.planning-inspectorate.gov.uk/](http://www.planning-inspectorate.gov.uk/)

Environment Agency  
[www.environment-agency.gov.uk/](http://www.environment-agency.gov.uk/)

Environment Agency Public Registers  
[www2.environment-agency.gov.uk/epr/](http://www2.environment-agency.gov.uk/epr/)

Information Commissioners Office  
[www.ico.gov.uk](http://www.ico.gov.uk)

Neighbourhood Statistics  
[www.neighbourhood.statistics.gov.uk](http://www.neighbourhood.statistics.gov.uk)

The Planning and Compulsory Purchase Act 2004  
[www.legislation.hmso.gov.uk/acts/acts2004/20040005.htm](http://www.legislation.hmso.gov.uk/acts/acts2004/20040005.htm)

Planning Portal  
[www.planningportal.gov.uk](http://www.planningportal.gov.uk)

### Non Governmental Organisations (NGO)

Air Quality – UK National Air Quality site  
[www.airquality.co.uk](http://www.airquality.co.uk)

Campaign to Protect Rural England planning site  
[www.planninghelp.org.uk](http://www.planninghelp.org.uk)

Environmental Law Foundation  
[www.elflaw.org/](http://www.elflaw.org/)

Liberty  
[www.liberty-human-rights.org.uk/](http://www.liberty-human-rights.org.uk/)

Wildlife and Countryside Link.  
[www.wcl.org.uk](http://www.wcl.org.uk)