

An aerial photograph of a city model. The buildings are represented by white blocks of varying heights. A large, irregularly shaped area in the center and lower-left is highlighted in a vibrant green color, indicating a specific urban planning zone. This green area contains several smaller green patches, some of which are surrounded by small, dark green tree-like models. The surrounding city is shown in a more muted, greyish-white tone. The overall perspective is from a high angle, looking down at the model.

SUCCESSFUL PLANNING

PUTTING SOCIAL, ENVIRONMENTAL AND ECONOMIC OBJECTIVES
AT THE HEART OF THE PLANNING SYSTEM



**Friends of
the Earth**

INTRODUCTION

The land-use planning system should be the principal means for communities to be involved in decision-making to deliver sustainable development, with democratic safeguards.

GOVERNMENT PLANS

The coalition Government has proposed significant changes to the English planning system. These changes will undermine the system's ability to deliver sustainable development and will create a democratic deficit.

The changes are set out in the Localism Bill, the Plan for Growth, and the draft National Planning Policy Framework.

They include:

- Prioritisation of economic growth throughout the system above all other considerations;
- Revised and shortened planning policy guidance in the form of the draft National Planning Policy Framework;
- A new tier of planning at neighbourhood level to be paid for by Forums or Parish Councils;
- New unelected neighbourhood forums to carry out neighbourhood planning unless there's a Parish Council to do this.

The Government wants to see developers in the driving seat. It has therefore proposed a role for them in the new neighbourhood planning system, a new purpose to deliver on business interests, and has suggested a presumption in favour of development, and simplified guidance. Some neighbourhood forums will effectively be unelected organisations for the 'promotion of business interests' but will be involved in planning that impacts wider society.

These proposals will result in planning for profit rather than for people. Planning affects the places where we live, our environment, our economic activities and our social interactions. The Government is effectively saying that the need for a narrowly defined type of short-term economic growth is more important than anything else.¹

THE PLANNING SYSTEM

The system emerged from an understanding that uncontrolled private development led to a wide range of social, environmental and economic problems. Its origins were in the Victorian era when public authorities used the system to deal with water contamination, the resultant epidemics and overcrowded housing. It's as relevant a mechanism as ever to deal with today's social and environmental challenges. But it must be greatly strengthened in order to do this.

SNAPSHOT OF THE SYSTEM

Information provided by the Communities and Local Government Department shows that in May 2011 more than half of local planning authorities had published a Core Strategy. Just fewer than that had submitted strategies to the Secretary of State for examination but only a third have an adopted strategy.

The level of approvals has consistently remained at around at least two thirds of applications received in recent years. This shows that the system is able to approve development. What is

Sustainable development in planning should be not be redefined to suit a market-led vision of growth. The UK Sustainable Development Strategy 2005 principles are: living within environmental limits; ensuring a strong healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly.

changing is the decreasing numbers of applications – due to wider economic factors.

PLANNING SUCCESSES AND FAILURES

Planning has enabled the public to be engaged in decisions about what happens where in terms of development, and has ensured legitimacy through the role of local government. It has delivered a wide range of benefits to our society that are often underestimated, particularly in terms of community participation and creating places where people want to live. Planning makes those engaged in development think about the wider public interest and impacts on society. Examples of the success of planning are the use of Green Belt to manage urban sprawl and the management of pollution such as waste water from housing and industrial developments.

But the planning system is not perfect, failing to give sufficient weight to environmental needs, economic diversity or social and environmental

Friends of the Earth believes the land-use planning system is the best way for communities to make decisions that deliver sustainable development.

justice. It has done too little to deliver affordable housing, has failed to protect biodiversity and urban green space or to address climate change, and has given retail diversity and local producers too little protection. The Committee on Climate Change's report *Adapting to Climate Change in the UK – Measuring Progress*² says local authorities are still permitting development on flood plains despite the increased risks, and are not taking sufficient account of water shortages. The Local Data Company reported in July 2009 that 12,000 independent stores had closed in the first half of 2009 alone. Some studies have shown that more than 200 local jobs are lost with the arrival of a supermarket.³

MARKET-LED AGENDA – THE WRONG SOLUTION

Although the planning system needs reform, the thrust of the Government's proposals are the wrong fix and threaten to exacerbate the system's existing inadequacy for delivering sustainable development. Changes to the land-use planning system are being driven by a narrow sector of commercial, business and developer interests. The risk of reforming the planning system to put these interests in the driving seat is that the public interest is no longer properly served.

Uncontrolled, poor quality and inappropriate development will have long-lasting and extremely damaging effects on local economies, society, and the environment.

The case of Northern Ireland and the Republic of Ireland in recent years demonstrates the implications of poor planning.

The Republic of Ireland relaxed planning to the extent that developers fuelled a property boom which has resulted in many empty developments in the subsequent economic downturn. Northern Ireland stemmed the pressure to deregulate further for a period. Consequently it hasn't suffered the same fate, although political pressure in a system with weak planning policy has led to inappropriate development there as well, with particular problems of waste water pollution.⁴

The Local Development Framework

The Local Development Framework is the local development plan for local planning authorities. It consists of a core strategy setting out the policies on what type of development is expected, a map setting out the use of land in various locations, and can also have area action plans for specific areas.

Green Belt land

The area of designated Green Belt land in England at 31 March 2011 was estimated at 1,639,540 hectares, about 13 per cent of the land area of England.

Source: Department for Communities and Local Government

COMMUNITY CONTROL?

Equality in planning

The Government is introducing neighbourhood planning as part of the localism agenda. But neighbourhood planning will also allow businesses to lead on planning in certain areas through the designation of “business areas” and the creation of Forums for the promotion of business interests.

IN THE DRIVING SEAT

Giving business a driving seat in plan-making won't necessarily deliver public benefit. A developer's analysis of benefits could be fundamentally different to the community or wider public's understanding of benefit. For instance the benefits of the toll road to the developer on the M6 Toll Road were the expected profits – whereas the public benefit would be in the reduction of congestion and pollution.

Neighbourhood plans will be overseen by the local authority and won't be able to depart from national guidance. More participation in planning should allow communities to create plans according to their ability and needs, in the most inclusive and accessible way possible. Local businesses, traders, and producers are obviously part of the mix of communities, and should be part of the planning process. But planning at this level shouldn't be about a single set of interests. It should bring together different interests in order to work out the best way forward in the context of sustainable development. This will require guidance, capacity building and culture change to understand the need to do things differently to achieve sustainability.

EQUAL VOICES?

Structural inequality in our society means that some people are more likely to suffer discrimination and have less access to resources depending on their race, socio-economic status, disability, gender, sexuality, faith and other relevant factors. These people are also less likely to live in a clean and healthy environment, which can affect quality of life.

Experiences vary between different places, but a recent Equality and Human Rights Commission report found that groups that share these protected characteristics under the Equality Act 2010 are under-represented in local decision-making.⁵

DCLG's most recent citizenship survey also found that when given greater flexibility many public bodies

tend to overlook vulnerable and under-represented groups and also younger and older people.⁶

Planning can be a complicated process to get involved in – information can be difficult to access, there's a reliance on long documents filled with technical terms and it can take a lot of knowledge, time, skills and confidence to participate effectively.

Neighbourhood forums must work for the whole community, be inclusive and actively seek members from underrepresented groups, and function in an accessible way.

UNFAIR OUTCOMES

Greater costs will be associated with neighbourhood planning – as the organisations responsible will have to

FRIENDS OF THE EARTH RECOMMENDS:

National Government must:

- Ensure neighbourhood plans are not solely used to promote business interests;
- Ensure neighbourhood planning processes and plans consider who's involved, and what the impacts are on different parts of the community;
- Provide guidance in the National Planning Policy Framework on addressing inequality.

Local Government must:

- Lead in helping neighbourhood forums and parish councils to address inequality in the involvement of the community in the planning process;
- Ensure planning policies and site allocations in the local plan address inequality;
- Build capacity and drive through cultural change to address equality and sustainable development.

PLAYING A PART?

The right to be heard

pay for planning processes – which risks exacerbating a situation where people who can afford to plan are able to improve and safeguard their environment, and those unable to pay suffer more bad local developments. In other words a more expensive system could increase environmental injustice.

Any reform of the planning system also needs to look at the impact of the decision making. For instance approving supermarkets where there are already local markets can have adverse impacts on local jobs, retail diversity and access to food for people on lower incomes. The cumulative impacts of developments on air quality are particularly apparent in poorer communities.

Neighbourhood Development Plan and Orders

The Localism Bill introduces Neighbourhood Development Plans which will have to take account of national policy, and the local plan. They will set out what sort of development should happen where. There are also Neighbourhood Development Orders which will grant planning permission for certain types of development in the neighbourhood area for a specific time.

The current planning system sets aside community interests too often and this is probably one factor contributing to very low public involvement in planning. People are also put off by the time and money involved in engaging, the bureaucracy, and the passive approach of planners.

RIGHT TO BE HEARD

A right to be heard, which is not at the discretion of an examiner, is an essential element in planning.

In an inquiry, people are allowed to put forward their view on proposals in person. Everyone should have an opportunity to put forward their ideas and feel confident that there is a clear and transparent process for considering these ideas. People should be able to take an active part in discussing proposals and options in person and receive feedback on their input.

The right to be heard exists when local authorities develop plans but is not proposed for the new neighbourhood planning system.

RIGHT OF APPEAL

There is currently no third-party right of appeal in the planning system in England. This is a significant injustice, as only applicants may appeal against a planning decision. Third parties have to seek judicial review which is costly and remote.

Developers, such as supermarkets who apply for planning permission, have a privileged right to appeal against a local council when their application is refused. Individuals and communities who object have no such right. This imbalance reinforces the impression of a planning system which is only interested in the developer, whatever the impact may be on a particular place.

FRIENDS OF THE EARTH RECOMMENDS:

National Government must:

- Enshrine a right to be heard in person in neighbourhood planning;
- Enshrine a right to appeal in specific, limited cases for the community.

DEVELOPMENT AT ANY COST?

Presumption in favour of development

The Government's draft National Planning Policy Framework recommends that "the default answer to development is 'yes'". Unless challenged this is set to become the new guidance on planning and development. The draft framework increases confusion and worsens the current planning system. It should properly regulate, enable communities to benefit from development and provide more of a role for communities to regenerate and improve their local environment. The existing policies could be better integrated and simplified, but must be made clearer and more directive.

The presumption in favour of development will undermine the objectives of the land-use planning system and marginalise communities further. This is because developers will know that it will be much more difficult for local authorities to refuse development, and that they don't need to listen to community views as it's likely they will get planning permission irrespectively.

The presumption will also encourage developers to behave speculatively and to ignore the Local Development Plan (the Plan). This is because they know that even if the area is not allocated for development in the Plan, the local authority is under pressure to approve any development.

But a developer is not in the position to have either a strategic overview of the needs of the community, or the best information about the local

context, or local environmental limits. This is why the Plan, which should hold this information, is so important in safeguarding the public interest. Decisions should be made in line with the Plan, and not just because the answer to all development applications should be "yes".

For instance the development of supermarkets has been shown to result in the net loss of jobs and retail diversity.⁷ The local authority should be able, through planning, to protect and promote local shops and markets and refuse supermarket development where it threatens this local economic activity.⁸

The Government must demonstrate its commitment to realising sustainable development. The Plan process sets private interests within a framework of sustainable development, public interest and the need to address climate change.

FRIENDS OF THE EARTH RECOMMENDS:

National Government should:

- Enshrine in legislation sustainable development as the purpose of planning as set out in the UK Sustainable Development Strategy 2005;
- Put an obligation on all levels of planning to actively reduce carbon emissions and take measures to adapt to climate change;
- Remove the presumption in favour of development.

Local Government should:

- Actively describe and provide clear guidance on what sustainable development means on the ground in local development frameworks;
- Encourage communities to work together with local government to produce supplementary planning guidance;
- Involve communities in area action planning through participatory methods.

LEVEL PLAYING FIELD

National Planning Policy Framework

The National Planning Policy Framework (NPPF) replaces all the existing planning policy statements, planning policy guidance documents and some circulars. It's the Government's overarching statement on the purpose of the planning system and sets out important objectives.

The new Framework represents a significant step back from sustainable development (as defined in the UK's 2005 strategy) and away from concepts such as environmental limits. It instead stresses the importance of economic growth and housing stock.

Friends of the Earth recommends that the national planning policy guidance contained in the new Framework should instead set out clear, directive, and integrated policies that work together to deliver sustainable development, and provide enough information to help developers and communities understand what this means on the ground without being restrictive. Local approaches and flexibility are built into a system that has national policy as a basis, but implements locally appropriate and distinctive plans.

SUSTAINABLE DEVELOPMENT

Planning must have a duty to deliver on sustainable development which is set out in legislation. Unsustainable development will reduce resources and irreparably damage the environment, leading to a further reduction in resources.

Sustainable development in planning encompasses the following principles:

- 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, ensuring climate change mitigation and adaptation, protecting and enhancing biodiversity, reducing harmful emissions, and promoting the sustainable use of natural resources (including those outside the UK);
- Resource conservation: ensuring that planning decisions assist in the prudent and sustainable use of finite natural resources (including those imported from outside the UK);
- 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 now and locally, rather than passing them on to other communities globally or to future generations;
- Public participation: ensuring that there are meaningful opportunities for people to engage in the planning decision-making process.

CLIMATE CHANGE

Around 80 per cent of UK carbon emissions are ultimately caused by locally based activities, from heating and powering our homes to local transport.

The Committee on Climate Change's 4th budget report recommends that the Government adopts a CO₂ target for the electricity sector of 50 g/kWh for 2030, as part of an overall economy target for 2030 of a 50 per cent cut on 1990 emissions levels. The key implication is that this requires steep and rapid decarbonisation from now to 2030. Meeting this challenge must happen at a local, regional and national level of development planning and strategy.

FRIENDS OF THE EARTH RECOMMENDS:

All plans should make a full contribution to delivering carbon emissions reductions in line with Government targets.

LEVEL PLAYING FIELD

ADAPTATION

Policies must prevent the development of housing and other building in flood risk and coastal erosion areas. In addition existing urban green space must be given strong protection. The development of new housing and employment land must maintain a network of green space to reduce urban heat effects and to limit impacts on biodiversity.

ENERGY

Spatial plans must gather sound evidence on energy supply and use in their area. Plans should assess and allocate sites for renewable energy and actively promote community and public sector-led development of renewables. Some 70,000 jobs could be created in local areas in domestic energy efficiency and renewable energy alone if local plans were focused on meeting suitably ambitious carbon-reduction targets.⁹

ECONOMIC ACTIVITY

A sustainable economy is not just a low carbon one but involves economic diversity, provides high levels of quality employment, distributes economic activity widely across regions and the country close to where people live, and makes use of local resources to create products and services that meet local needs and quality of life. Planning has a major role in creating and protecting such an economy.

Building a low-carbon economy nationally has the potential to create many thousands of jobs such as in retrofitting housing or installing small-scale renewable energy.

But if the Government wishes to see a strong and successful economy of local businesses, then coordinated support is needed, including through local planning. Strong local plans would help protect economic diversity in three ways. Firstly by requiring thorough economic impact assessment including factors such as job creation and displacement, retail impact, diversity impact, local multiplier and damage or benefit to ecosystem services. Secondly by developing the supporting infrastructure that local businesses need to remain competitive, such as efficient local public transport networks. And thirdly by ensuring the provision of a range of sizes of sites, units and properties, which in some areas might involve retaining or specifying small units as well as ensuring large sites are available. Developers should be encouraged to work with existing uses and ownership rather than taking a 'blank slate' approach to a site.

Recent research has shown that new businesses (particularly smaller ones with fewer than five employees) and self-employed people account for more than half of new jobs.¹⁰ They are also more likely to use local supply chains, thus multiplying these benefits in an area and reducing transport and its various costs. Recognising the role of these small businesses and providing for them through planning would generate resilient economic activity.

Balanced communities should provide employment, retail and housing, in villages, towns and cities. Instead of dormer villages or towns for larger

A recent report by the Committee on Climate Change Adaptation sub-committee found that since 2001:

- In almost all of the nine English local authorities studied, development in areas of flood risk had increased, and in four of them the rate of development was higher than across the locality as a whole;
 - Three of the four coastal authorities saw an increase in development in areas of eroding coastline, and in two of them the rate of development on unprotected coastline was higher than across the authority as a whole;
 - The area of hard surfacing increased in five of the six urban authorities studied, primarily at the expense of urban green space, which declined in all six – this is likely to exacerbate surface-water flooding risk and the urban heat island effect.
-

centres, more rural employment should be promoted. Employment sites should be distributed across areas rather than concentrated in certain centres. This would reduce transport and housing pressures on growth points and instead foster opportunities across the area. Facilities and services, leisure and retail, should be provided for on a more dispersed basis.

This also applies at the national scale, where planning interventions are necessary to distribute economic growth better around existing centres of population rather than in the South East.

TRANSPORT

Moving towards low-carbon transport and decreasing use of private cars will create jobs and cut carbon emissions. The pollution and traffic associated with recent car-dominated patterns of development hit those without cars hardest. More than half of all journeys are shorter than five miles. Targets for traffic reduction must be set, particularly within urban areas where access to public transport, walking and cycling can be greatly improved. New development should actively seek to reduce the need to travel by private car and promote access by walking and cycling and public transport. Other factors, such as the loss of decentralised facilities and services in rural areas, should be turned around to reduce the need to travel. Out of town developments should be discouraged as they will increase congestion, pollution and encourage sprawl.¹¹

RETAIL

The face of retail has changed radically with the loss of thousands of small shops and businesses since the 1950s and the takeover of the big supermarkets. This has affected the diversity, cost and accessibility of retail within communities. Friends of the Earth recommends that development plans must rebalance provision in favour of smaller shops, local producers, markets, local supply chains and procurement, more diversity of choice, and a greater number of small businesses rather than a small number of dominant companies.

HOUSING

New housing must be planned as part of balanced sustainable communities. Housing, and indeed all new developments comprising the built environment, must employ the highest possible standards of sustainability in their design, location and layout.

Minimum density targets should be supported according to area, and brownfield sites should be prioritised where appropriate.

Development plans should permit 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. Such development has a minimal effect on the local and global environment, provides a visionary model for how sustainable communities might develop in the future and redefines affordable housing in terms of running costs.

ResPublica reports that supermarkets now sell 97% of food, with four chains accounting for 76%.

LEVEL PLAYING FIELD

There is a need both to increase the supply of homes, in particular affordable housing, and 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.

All residential areas should have green spaces and sites of nature conservation value.

Existing housing must also be improved to address sustainability, and house improvements of this nature should not require permission.

RESOURCE USE

Limits to resource use must inform decision-making.

Waste should be treated as a resource. It should be the objective of planning policy to prevent over-provision of incineration, to actively implement the waste hierarchy and prevent waste which can be re-used or recycled from being landfilled or incinerated. Final waste disposal options must be small scale and flexible to deal with an ever decreasing residual waste stream. Much more must be done to create systems to collect waste for composting and anaerobic digestion of food waste, which will help to improve soil fertility, in addition to capturing more resources for this purpose from the sewerage treatment system.

WATER

Planning must ensure that developments are prevented which might pollute or affect the

natural route of water courses or groundwater. Developments that put pressure on abstraction of water in drought-prone areas must be refused. All new developments should have sustainable drainage systems, and systems for water re-use and collection.

Spatial plans should set out how flood defence and river management will use the natural environment. This is so that communities and developers understand the role of areas in managing extreme weather – which is predicted to become more common.

BIODIVERSITY

Biodiversity action plan targets, woodland, strategic river corridors and floodplains must be supported and protected through planning.

In both urban and rural areas, networks of sites should be allocated to build green infrastructure to help create resilience in the face of climate change.

Plans should seek to minimise their impact on international resources to help protect international biodiversity.

There should be a presumption against any development that will damage sites of national and regional nature conservation value. Local authorities must work together on spatial matters – for instance on river catchment management and the management of habitats to enhance their ecological value as individual areas and as part of a coherent ecological network.

Welsh planning policy

Wales' policy on rural development is exemplary – designating some rural development sites as 100 per cent affordable, and allowing new homes to be built for people employed in rural enterprises and farming. Its policy on low impact housing is also important in changing building methods.

AGRICULTURE

Preserving good agricultural land is essential for food security and resilience, to reduce emissions from food production and to reduce pressure on agricultural resources and biodiversity globally. Pressure on agricultural land through the intensification of farming must be strongly resisted as unsustainable.

To preserve and enhance soil fertility, the capturing and recycling of organic waste must be built into all new developments and a programme of retrofitting the existing

system where household waste is mixed with industrial waste must be stopped. Artificial fertilisers are a finite resource and therefore should not be a mainstay of the food production system.

FOOD

Food-growing in urban areas, from allotments and community gardens to city farms, serves a vital purpose for food production as well as providing health and community benefits through access to green space and exercise. It should be promoted.

FRIENDS OF THE EARTH RECOMMENDS:

National Government should:

- Set out clear and directive planning policy (as set out here) that approves development that addresses climate change, protects local economies, increases biodiversity, and delivers social and cultural benefits.

Local Government should:

- Ensure that the local plan sets out policies and places for development that address climate change, protect local economies, increase biodiversity, and deliver social and cultural benefits.

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SUCCESSFUL PLANNING

The Government is proposing changes to the planning system and national planning policy that will give a greater role to business interests and promote a narrow model of economic growth over the interests of people and the environment.

The planning system should be a cornerstone of the governing of sustainable development – where economic development protects and enhances the environment and supports a good quality of life for everyone.

Friends of the Earth is committed to a planning system which works for everyone. We believe that planning can deliver community empowerment, democratic accountability and sustainable development.

This document sets out Friends of the Earth's recommendations in view of the changes proposed by Government.

Friends of the Earth is:

- the UK's most influential national environmental campaigning organisation
- the most extensive environmental grassroots network in the world, with around 2 million supporters across five continents, and more than 70 national organisations worldwide
- a unique network of campaigning local groups, working in more than 200 communities throughout England, Wales and Northern Ireland
- dependent on individuals for over 90 per cent of its income.



**Friends of
the Earth**

Making life better for people by inspiring solutions to environmental problems

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