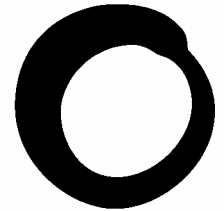


May 2004



**Friends of
the Earth**

Consultation Response

Planning Policy Statement 1: Creating Sustainable Communities

A response by Friends of the Earth

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Planning Policy Statement 1: Creating Sustainable Communities

Introduction

Friends of the Earth believes the planning system should have a visionary purpose to deliver sustainable development through processes which are both transparent and democratic. The purpose of Planning Policy Statement 1 must be to recommit the practice of planning to the achievement of these principles. The tone of PPS 1 is equally important and should stress in clear language the achievements of planning regulation and celebrate its local democratic basis as unique in environmental regulation in the UK.

Summary

1.1 Friends of the Earth made a significant contribution to the pre consultation drafts of PPS 1. As a result this response focuses on a number of broad policy issues which we believe still require significant modification. Overall we continue to be concerned that the document unfairly prejudices economic growth over the other important pillars of sustainable development. In particular the tone is focused very much on the needs of economic competitiveness while much less attention is paid to key environmental challenges which confront the planning system, particularly in relation to climate change. The draft also sends equivocal messages as to whether the pillars of sustainable development should be 'integrated' or 'traded off' in planning decision-making.

Positives

1.2 Friends of the Earth strongly welcomes the inclusion of a commitment to public participation and involvement in PPS 1. Overall Friends of the Earth remains very concerned as to how these principles are translated into precise standards of participation, particularly at the regional tier of planning. However, we believe the statements of principle and particularly the acknowledgement of the importance of the Aarhus Convention are a very positive step forward in creating a comprehensive and coherent framework of public participation in planning. Such commitments can only assist in communicating the purpose of planning to the wider public and in securing public legitimacy. We also strongly support the new material in the draft PPS on social inclusion and spatial planning.

Negatives

The purpose of planning!

1.3 While Friends of the Earth welcomes the statement in paragraph 1.1 that sustainable development is the core principle of planning we remain concerned that paragraph 1.2 and 1.3 detract from this message by providing detailed discussion of the objectives of the Sustainable Communities Plan, 2003, without making clear what the relationship is between these goals and the overarching achievement of sustainable development. It is absolutely clear that these two ideas cannot be conflated nor do they share a set of common values. The definition of a 'sustainable community' listed in annex A is quite distinct from accepted definitions of sustainable development and even the UK Sustainable Development Strategy. For one thing it includes nothing about the natural environment at all. The potential for confusion between these two ideas is compounded by the title of this PPS which makes no mention of sustainable development.

1.4 The title and substantive purpose of this PPS must be the achievement of sustainable development of which sustainable communities is a distinct sub set of policy initiatives. This hierarchy of objectives should be made clear inside paragraph 1.1. In addition and for or the sake of clarity PPS 1 should be titled as ***'Delivering Sustainable Development'***.

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1.5 The definition of sustainable development

Friends of the Earth believes that the planning system is one of the principal delivery mechanisms for achieving sustainable development. PPS 1 has a particular responsibility to ensure that sustainable development is robustly defined in a way which allows meaningful changes to the methodology and outcomes of planning. We believe the current definition is deficient in 4 principal ways.

A) The disproportionate weight given to economic growth

1.6 We continue to believe that taken together the draft is unbalanced, focusing disproportionately on economic growth over social or environmental objectives. This imbalance is reflected in the contrast between the amount and character of the exposition of in paragraphs 1.15 to 1.17 on the economy and paragraph 1.20 on the environment. In addition the reordering of the pillars of sustainable development from the UK strategy in paragraph 1.13 might be read as an unintentionally crude attempt to draw more attention to economic growth as a core objective in the planning system.

B) The way growth is defined

1.7 Friends the Earth recognises that PPS 1 broadly attempts to transpose the principles contained within the UK Sustainable Development Strategy. However, we do not believe that the crude definition of economic growth provides a sensitive nor detailed enough definition to genuinely shift the culture and practice of planning to help secure a more sustainable society.

1.8 While Friends of the Earth support the objective of high and stable levels of employment, we believe that economic growth as currently defined and measured should not be regarded as an end in itself. It may often assist in the achievement of the other three goals, but often it may not. We need to be far more rigorous in distinguishing between the kind of economic growth that is compatible with the transition to a genuinely sustainable society, and that which is not. In the past the planning system has given overwhelmingly greater importance to a crude GDP based model of economic growth and has effectively subordinated protection of the environment and prudent use of resources to these other objectives. This approach has been a barrier to the achievement of sustainable development because of the resulting damage to the environment and loss of natural resources which is already imposing significant economic costs on society.

1.9 Friends of the Earth supports the Sustainable Development Commission suggested amendment of the 4th pillar of sustainable development.

'The Government's fourth objective about the economy should be re-formulated in such a way:

- as to promote the kind of economic growth that supports social progress, high employment levels, protection of the environment and prudent use of natural resources, and to discourage the kind of economic growth that does not;*
- and*
- that links high employment with the goal of social progress and wellbeing, rather than with economic growth, since having satisfactory work is such a fundamental part of social and personal security and identity.'* (Sustainable Development Commission 2004)

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C) Failure to include vital components of sustainable development

1.10 PPS 1 fails to recognise important aspects of the sustainable development ideal which are represented both in the UK Sustainable Development Strategy (1999), other important planning strategies such as the Wales Spatial Plan (2003) and the findings of the Royal Commission on Environmental Pollution's 23rd report 'Environmental Planning'. These missing principles include:

- environmental limits: ensuring that resources are not irrevocably exhausted or the environment irreversibly damaged. This means, for example, supporting climate protection, protecting and enhancing biodiversity, reducing harmful emissions, and promoting the sustainable use of 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;

1.11 In addition to the accurate transposition of the UK Sustainable Development Strategy, PPS 1 should identify the need to achieve:

- 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;

1.12 Both these principles were identified by the Royal Commission on Environmental Pollution as vital components of sustainable development. (RCEP 23rd report 2002) It is important that all these principles are properly identified in describing sustainable development and we strongly suggest that there are incorporated into paragraph 1.12. We note that the Wales Spatial Plan contains a clear, full and operationally useful definition of sustainable development and we strongly urge that PPS 1 contains an equally coherent statement.

D) The principles of sustainable development: trade off or integration?

1.13 Paragraph 1.23 and 1.24 appears to provide contradictory advice in considering the weight to be given to the four pillars of sustainable development. On the one hand this paragraph appears to indicate the desirability of integration but at the same time it makes clear that local authorities can give more weight to particular pillars when they see fit. While integration is extremely challenging to traditional planning methodologies it should be strongly encouraged by providing more guidance, here and in best-practice, on how the process should take place.

1.14 In addition it is vital to make a distinction between how sustainable development is incorporated into policy and how it is applied to individual decisions. Paragraph 1.24 states that local authorities might seek to give 'extra weight' to one of the pillars in planning policy.

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This suggestion is very different to giving extra weight to the impact of a particular pillar in actual land-use decisions. The point is that policy must always seek the highest standards of integration providing a framework for sustainable development. In a specific application we acknowledge that, rightly or wrongly, other material considerations may be influential. This paragraph needs to be redrafted to ensure such integration is the first and most important priority, that policy should support this view and the development control decisions should carefully seek to uphold this integrative approach wherever possible.

Failure to adequately highlight key environmental challenges such as climate change and biodiversity.

1.15 One of the consequences of the over emphasis on economic growth is that while the need for increased competitiveness receives a good deal of policy discussion, the treatment of climate change and biodiversity is brief and inadequate. As a result, the current draft provides no real indication as to the imperative in dealing with the real environmental challenges which confront the nation.

1.16 Climate change urgently needs to be incorporated as a key operational principle of the planning system by making clear in paragraph 1.22 that anything relevant to how far development either reduces or adapts to climate change is a 'material consideration'. This broadening would be consistent with the new power conferred on local authorities to promote the environmental, economic and social wellbeing of their areas, and would help the planning system play a full role in applying this new power. Again we would favour the approach taken in the Wales Spatial Plan which communicates both the extent of the threat of climate change and makes clear how planning can respond.

1.17 Nowhere in the discussion on the environment is there the briefest mention of the principles in the UK Biodiversity Action Plan. These principles should be incorporated into a separate objective inside paragraph 1.22.

Prudent use of resources

1.18 We would welcome greater emphasis on the importance of resource conservation by changing the tone of paragraph 1.21 from the weak 'encouraging energy efficiency...' to the more positive 'promoting energy efficiency...'. We doubt that in its current form this policy will bring about any meaningful change to the practice of planning decision making.