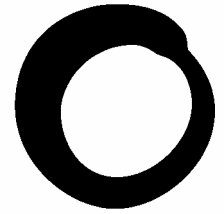


January 2004



**Friends of
the Earth**

Consultation Response

Planning Policy Statement 12: Local Development Frameworks

A response by Friends of the Earth

Friends of the Earth inspires solutions to environmental problems, which make life better for people.

Friends of the Earth is:

- the UK's most influential national environmental campaigning organisation
- the most extensive environmental network in the world, with almost one million supporters across five continents and over 60 national organisations worldwide
- a unique network of campaigning local groups, working in over 200 communities throughout England, Wales and Northern Ireland
- dependent on individuals for over 90 per cent of its income.

To join or make a donation call us on 0800 581 051

Friends of the Earth, 26-28 Underwood Street, London N1 7JQ

Tel: 020 7490 1555 Fax: 020 7490 0881 Email: info@foe.co.uk Website: www.foe.co.uk

Friends of the Earth Limited company number 1012357

♻️ Printed on paper made from 100 per cent post-consumer waste

Planning Policy statement 12 : Local Development Frameworks

Introduction

Friends of the Earth has expressed a number of key concerns over the planning reform agenda and continue to believe that the provisions of the Planning and Compulsory Purchase Bill do not deliver the clarity and purpose which the planning system requires. We are particularly concerned that the reform of the local plan process was not founded on any evidence-based analysis of the faults of the existing system. The reform package seeks to make structural changes to the framework when the problems of the system were largely managerial, cultural and financial. As a result, we believe that the new system is overly complex. This will lead to greater costs, less efficiency and will create a real barrier to encouraging greater participation in the land-use planning system.

However, we recognise that much of the procedural content of PPS 12 is enshrined in the Bill itself and is not open to significant change through guidance. We have therefore restricted our comments to a number of key concerns that are within the scope of PPS 12. Friends of the Earth fully supports the detailed submission made by WCL.

Content and scope of the PPS

1.1 Friends of the Earth believes that PPS 12 must stress the fundamental role of Local Development Frameworks in the delivery of sustainable development. The current draft places too great an emphasis on the delivery of strategic economic development needs compared with the needs of biodiversity, cultural heritage and environmental justice, which must be integrated fully with economic objectives if sustainable development is to be achieved. The PPS should emphasise the vital importance of the LDF in meeting the major challenges of issues such as climate change.

1.2 While we recognise the rationale behind the government's intention to produce shorter PPSs, we are concerned at the absence of some of the more useful features of PPG 12 in the draft PPS – for example, a table listing the policy areas which development plans should address. There are a number of sections where greater detail (or at least clear cross referencing of topical PPSs) would be useful – e.g. on the designations which LDFs must reflect in the proposals map (paragraph 2.2.15). While we feel the integration of environmental with other needs to achieve sustainable development needs to be stressed throughout the PPS.

The spatial planning approach

1.3 Friends of the Earth agrees that the spatial planning approach is crucial, and we are pleased to see the requirement in paragraph 1.3.1 that the spatial plan should be concerned with environmental and social, as well as economic matters. However, we consider the concept of 'balancing competing demands' to be an outdated one, and believe that paragraph 1.3.1 should require the integration of these three factors. Guidance should also make clear that concepts such as environmental capacity and environmental justice are at the heart of decision-making over the future of our localities. We also welcome the requirement that Local Development Documents should give spatial expression not only to planning matters but to the community strategy and other strategies with a spatial element, including biodiversity strategies.

Planning Policy statement 12 : Local Development Frameworks

Public participation

1.4 We welcome the commitment to meaningful community participation, processes for which will be laid out in the Statement of Community Involvement. (SCI) However, the final PPS 12 must deal with the following issues:

- Provide an indicative list of the kinds of standards SCI should include.
- Make clear that it is vital that an SCI is adopted prior to the adoption process for Local Development Frameworks.
- Provide guidance on the legal status of SCI in relation to development control (or make clear in what document this issue will be clarified).
- Provide clear guidance that the complexity of the new system is a potential barrier to participation and ensure local authorities reduce complexity wherever possible. For example, PPS 12 should make clear that it is desirable to have got all local development plan documents at the same time through the same process. Such an approach should be enshrined in the Local Development Scheme.
- Provide an indicative list of kind standards SCI should include.
- Require local planning authorities to commit to imaginative communications strategies to sell the importance of the local planning framework. In particular PPS 12 should acknowledge the immensely confusing series of acronyms surrounding the new Local Plan Framework and encourage local authorities to employ plain English. (this would also be desirable in the contents of PPS 12)
- Provide further guidance on how the requirements of continual review and three-year replacement can be squared with quality participation. In particular on how participation fatigue can be avoided for all parties.
- Make clear the scope and range of documents which layout the Government's commitment on participation. This should include a digest of primary legislation, regulation, guidance and best practice.
- Make clear that specific resources must be dedicated to in house Local Authority participation initiatives.