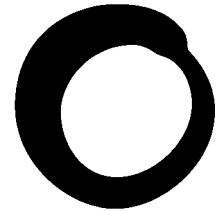


September 2008



**Friends of  
the Earth**

# Local Development Frameworks

*'The new planning system is complicated, but if you want to stop something 'bad' from happening or to promote something 'good', then this is the place to get involved.'*

Anthony Rae, Calderdale 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](mailto:info@foe.co.uk) Website: [www.foe.co.uk](http://www.foe.co.uk)**

Friends of the Earth Limited company number 1012357

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

## 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 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 local planning system

The Planning and Compulsory Purchase Act 2004 sets out a two tier planning structure:

- Regional Spatial Strategies (RSSs) replace Regional Planning Guidance (RPG) in setting out policies relating to the development and use of land for each English region.
- Local Development Frameworks (LDFs) will replace structure plans, Local Plans and Unitary Development Plans.

Most of the changes to the system relate to making plans and writing policies and not to decisions on planning applications. The flow chart on page 4 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

- The Regional Assembly is the Regional Planning Bodies (RPB), and they must prepare and publish a statement of how they have involved people in the preparation of a draft RSS revision.
- The Regional Spatial Strategy (RSS) is tested at an Examination in Public. No person has the right to be heard. The event is invitation only.
- RSS has a statutory duty to contribute to the achievement of sustainable development.
- The RSS is drawn up for every English region except London, where the spatial development strategy is known as the London Plan. It cannot be site specific but contains broad policy statement of how much of what might go where. For example housing numbers and retail capacity.
- When preparing the draft revision, the RPB must also prepare, publish and submit a sustainability appraisal that includes Strategic Environmental Assessment (SEA).
- For further reading see Friends of the Earth's Campaigner's Guide to Strategic Environmental Assessment.

## Local Planning

- Local Development Frameworks (LDFs) are developed by Local Planning Authorities (LPAs). These will replace local plans, unitary development plans and structure plans.
- County Councils and some Unitary Authorities must also prepare and maintain a minerals and waste development scheme.

- Local Development Documents must 'conform' with RSS (or the London Plan). If the Regional Planning Body does not think the LDD is in general conformity with the RSS they can request a change to the document. This will be ultimately be decided by the Secretary of State. In policy terms therefore, it is vital that good policies are incorporated into the RSS and all the bad ones taken out, as these will be reflected into the LDF.
- Changes to policy around the preparation of LDFs has recently been published, and the emphasis is upon engaging with developers and landowners in the early issues and options stage of the plan.

## 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 Sustainable Community Strategy. Introduced under the Local Government Act in 2000, these community 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 must contain a Core Strategy and proposals map. The Core Strategy should include a vision, strategic objectives, and a delivery strategy. They can also contain (up to the local authority to decide) other documents such as Area Action Plans.
2. Other documents: These documents contain, amongst others, the Statement of Community Involvement (SCI), the Local Development Scheme (LDS), and Supplementary Planning Documents (SPD).

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?

The Local Development Scheme (LDS) is a kind of timetable. These schemes will set out what Local Development Documents will be prepared, the timetable and whether they are to be jointly prepared with other Authorities. All Development Plan Documents will have to be subject to an independent Sustainability Appraisal (SA).

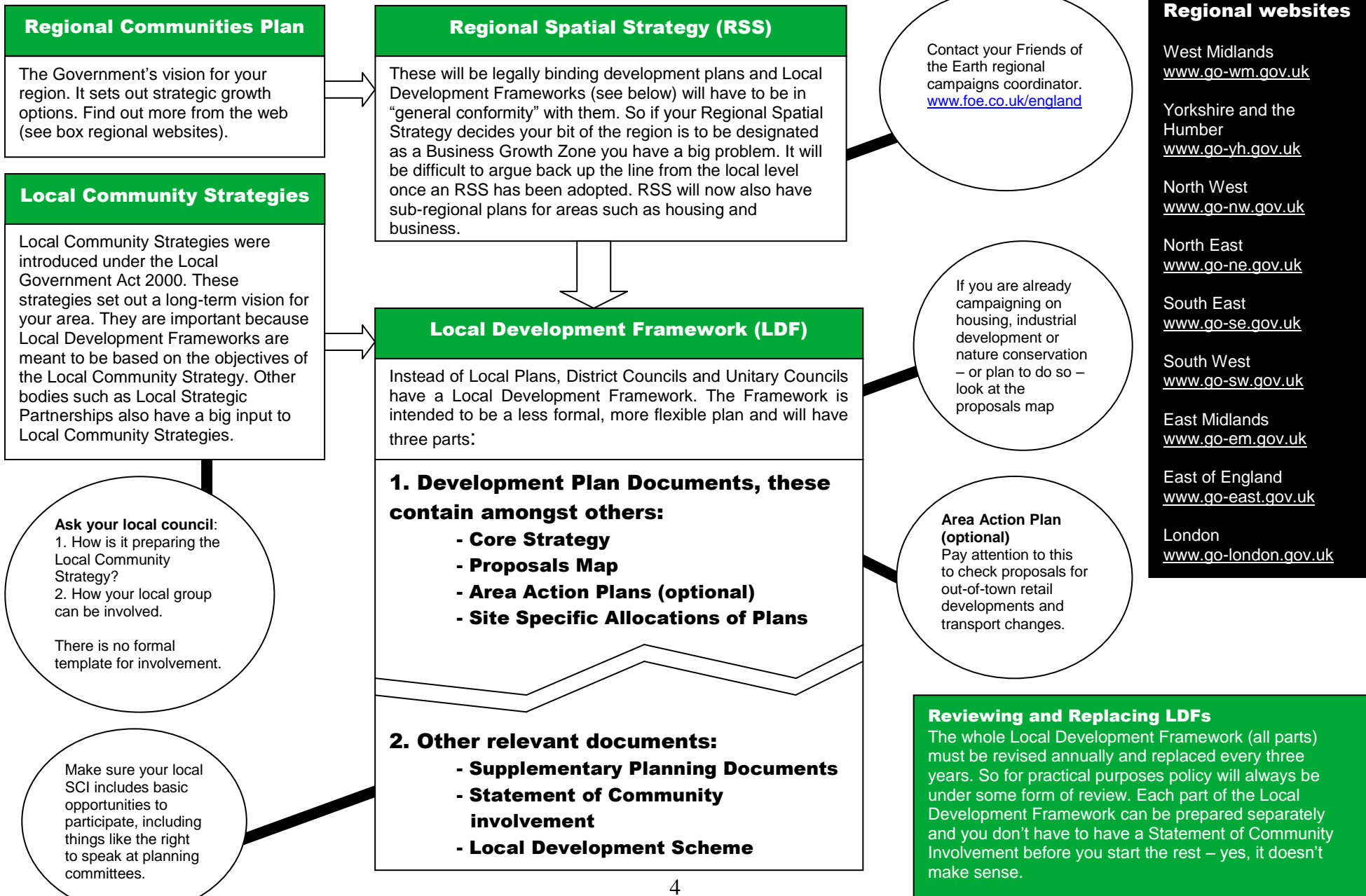
## Public involvement

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 and refer to Friends of the Earth's guide to Local Development Schemes.

## The English planning system and Local Development Frameworks



**Warning: changes ahead!**

The Government has decided to 'streamline' the Local Development Framework (LDF) preparation process. These changes have been made by issuing a new Planning Policy Statement on LDFs (PPS 12) in the summer of 2008. The most significant change is the removal of one formal stage in the consultation process before the final draft plan is published. Currently there are three formal opportunities to be consulted so despite the Government move you still have right to be consulted on a draft of the plan and you still have a right to lodge and objection to the deposit version and be heard at the examination.

**The LDF preparation process in England**

Stages of the LDF Process	What you can do
Council draws 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	
Key stakeholder involvement on key planning issues and options	Local authorities will be involving major landowners and developers in these key early discussions. Try and persuade them to give you a chance to respond. Particularly important if you have parish or neighbourhood plans that link in to the Community Strategy. Use the Friends of the Earth local policy guide to help you respond if you get an opportunity to do so. Look at the Statement of Community Involvement for more information on getting involved at this stage.
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.
Inspector's Report	The inspector has the final say and is legally binding.
Plan adopted	You can seek redress by a legal challenge which is known as Judicial Review.
Annual Monitoring report	Opportunity to begin lobbying for new policy and to point out success and failures that need to be addressed.
Annual Review and beginning of 3 year replacement cycle	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, greenhouse gas reduction targets etc.

## How you can get involved

### Regionally

- Find out what the status of your RSS is by contacting your regional government office, by going to your regional government website or contacting your Regional Campaigns Coordinator. Friends of the Earth at the regional level have made extensive representations to their regional strategies.
- Get hold of a copy and see what impact it might have for your local area by looking at the key diagrams.
- Read the Friends of the Earth 'regional policy guide' at [www.foe.co.uk/resource/local/planning/resource/index.html](http://www.foe.co.uk/resource/local/planning/resource/index.html)

### 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 Local Authority Guide on SCI's.
- Look closely at the Core strategy's proposals map to see where the big areas of change might be.

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

## Top tips on submitting responses to your local planning authority (LPA)

### 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
- 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 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.

## 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 to dress up what you say in any special language. There are two top tips:

- 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.
- 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, without compromising 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 that 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 employment sites where these can help to diversify the local economy and lead to the development of indigenous 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.

## 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.

**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 applicant can satisfy all the safeguards contained within PPG 6/Draft PPS 6 and specifically the sequential approach and the requirement to demonstrate 'need';
- 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**

### **What can planning do on climate change?**

Well thought-out planning policies can make a significant positive contribution to meeting the challenge of climate change. For example, planning policies can tackle climate change by:

- Promoting high standards of energy and resource efficiency in new development and retro-fitting of existing development;
- Shaping land-use patterns which reduce the need to travel by car;
- Promoting small and large scale renewable energy projects;
- Adapting to the harmful impacts of climate change;
- Restricting development which has a major negative impact on climate change emissions.

### **The thinking behind the policy**

Climate change is affected by the concentration of greenhouse gases in the atmosphere. Carbon dioxide is the principal greenhouse gas. Given that this gas can remain in the atmosphere for up to 200 years, our actions now have ramifications for many years to come. If we are serious about making the emission reductions required to avoid climate change we cannot wait until 2050 before making drastic, last minute cuts.

Friends of the Earth believes that all levels of government must move beyond policies that merely slow the growth of emissions. To tackle climate change, we must act now to make sustained annual reductions in the emissions of greenhouse gases.

Such thinking will require tough action. Currently, even the most progressive local authority planning documents (of which we are aware) only suggest **slowing** the growth of emissions,

and none so far act to **reduce** overall emissions. Friends of the Earth believes that at the bare minimum, all councils should have a policy that mirrors that of the more progressive councils. Such policies have already been proven to be feasible and legally acceptable.

However, we believe the councils should go beyond the current best practice, and move towards policies which ensure that new developments don't create a net increase in the carbon dioxide emissions of their area. This position is actually supported by new national planning policy documents which make it clear that local planners must deal with factors which contribute to climate change to ensure that the country delivers on its national and international obligations.

Below are outlined two key policy statements. You should choose one of these options and ask for the relevant text to be included in your council's new Local Development Framework. The first statement is the bare minimum standard that we believe councils should adopt. The second is a more ambitious policy that we believe councils should adopt if they are serious about tackling climate change. Obviously the first statement will be easier to promote, whilst the second statement faces up to the challenges that tackling climate change presents - but will be more controversial.

**Friends of the Earth recommends the following statements (either/or):**

**1)** The Council will require all developments, either new build or conversion, with a floor-space of 500 m<sup>2</sup>, or one or more residential unit, to incorporate on-site renewable energy equipment to reduce predicted CO<sub>2</sub> emissions by at least 10%.

**2)** The Council is committed to addressing and reducing the causes of climate change. To achieve this objective all new development, either new build or conversion, will be required to demonstrate that it does not add any net carbon dioxide emissions over the life-cycle of its operation. Developers may adopt a range of technological approaches to achieve this objective, including:

1. A zero waste, zero carbon standard (based on the Z-squared standard) for any large scale housing development.
2. A minimum of EcoHomes 'Excellent' standard for any housing development of one unit or more.
3. A minimum of BREEAM 'Excellent' for any commercial development.
4. The development of on-site renewable energy generation capacity.

In the policy guidance in development control, the local authority can outline that it will be for the developer to decide which approach is the most appropriate to deliver a zero net carbon standard in their specific proposal.

**The policy could include a statement such as the following:**

The applicant must demonstrate, through a development appraisal, if the adoption of such an approach results in an undue burden on the viability of the scheme. In addition, there will be a presumption against any development which results in a significant net increase in carbon dioxide emissions.

(Also see separate briefing listed in the references).

### **Future supply of and demand of water**

Climate change is adding significantly to the uncertainties of future supply of and demand for water. Areas that are already experiencing water constraints on development are likely to find problems exacerbated. LDFs should contain policies that give strategic consideration to the limits which water management places on development.

## **6 Renewable Energy**

Planning has an important role to play by helping us to move from a highly centralised, fossil fuel and nuclear based energy system towards a more distributed and sustainable renewable energy system. The key policy dilemma for LDFs is to balance the imperative for the development of renewable energy technologies with respect for important statutory designations relating to biodiversity, built heritage and landscape quality. In striking this balance, it is vital to provide detailed guidance for LDFs.

### **International Designated Sites**

Stringent policy tests should apply to renewable energy developments which affect international designations. Friends of the Earth believes that an even greater emphasis should be given to the absolute protection of such sites, so that development will only be permitted where it can be shown that there will be no appreciable damage to the designated area.

### **National Designations**

Friends of the Earth supports the stringent protection of national designations from any inappropriate form of development. However, where it can be shown that small-scale renewable development will not damage the intrinsic value of designations such as National Parks, they should be encouraged. Likewise, small-scale renewables should be considered in conservation areas and on listed buildings where it can be shown that no damage to the intrinsic value of the building would result.

### **Buffer zones and Local Designations**

Local designations are a vital aspect of planning policy, allowing local communities to express their aspirations for environmental protection and enhancement. Such designations should remain a material consideration in the determination of all forms of development, including renewable energy. Friends of the Earth does not believe however that buffer zones on local designations should be used to unreasonably refuse renewable energy projects which have clear environmental benefits.

### **Visual Effects**

Where appropriate, landscape impact assessments should be a key way of understanding the potential impacts of renewable energy. Local authorities should seek to avoid such impacts where they unacceptably degrade the intrinsic value of statutory designations. Where avoidance is not possible, comprehensive mitigation should be applied.

### **Energy efficiency**

The LDF could include policies to promote energy efficiency criteria for homes and businesses. This has links to tackling fuel poverty, and it creates jobs and reduces costs as well as protecting the environment – so it is ‘win-win-win’. In the core strategy, a commitment to increasing energy efficiency in buildings and in businesses could be outlined. Supplementary Planning Guidance should establish criteria for various types of renewable energy technologies. In general, this should protect biodiversity and landscapes. There

should be a presumption in favour of development, subject to complying with this guidance. Technologies covered by the policy should include offshore wind, onshore wind, wave, tidal, hydro, energy crops, biowaste, geothermal, and photovoltaic. Criteria for local small scale generation should be less strict.

**Examples of renewable energy policies and targets which could be included in LDFs:**

All new industrial, warehousing, live/work units outside conservation areas and above a threshold of 1000 m<sup>2</sup> will be expected to incorporate renewable energy production equipment to provide at least 10% of predicted energy requirements.

The following target should ideally be based on regional consumption of electricity. Breakdowns of this target by sub-region or by technology should be indicative.

The council is committed to the regional minimum target for generation of electricity from renewable energy schemes as part of the national target of 10% by 2010.

## 7 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.

### **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 Building Research Establishment for example has developed a measure of resource efficiency known as the 'Eco Home' standard.

Friends of the Earth strongly recommends that the LDF should support the achievement of the Eco Homes 'excellent' standard for all new homes built over the plan period.

### **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 approximately 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 believes 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. During the first half of 2005 many regions will be revising their Regional Transport Strategies (RTS - as part of their RSS), and districts / counties their Local Transport Plans 2006-10. 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:

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, for example in the 1998 White Paper 'A New Deal for Transport'.

### 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 Resources

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

Website: [www.foe.co.uk](http://www.foe.co.uk)

### **Planning**

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

Website: [www.YourPlanningRights.co.uk](http://www.YourPlanningRights.co.uk)

### **Right to Know**

Email: [right2know@foe.co.uk](mailto:right2know@foe.co.uk)

Website: [http://community.foe.co.uk/tools/right\\_to\\_know/](http://community.foe.co.uk/tools/right_to_know/)

### **Rights and Justice Centre**

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

## Useful web sites

### **Government**

Audit Commission

[www.audit-commission.gov.uk](http://www.audit-commission.gov.uk)

Department for Communities and Local Government

<http://www.communities.gov.uk/>

The Planning Inspectorate

<http://www.planning-inspectorate.gov.uk/>

Environment Agency

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

Environment Agency Public Registers

<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/)

Neighbourhood Initiatives Foundation

[www.nif.co.uk/](http://www.nif.co.uk/)

Planning Aid

[www.planningaid.rtpi.org.uk](http://www.planningaid.rtpi.org.uk)

Wildlife and Countryside Link.

[www.wcl.org.uk](http://www.wcl.org.uk)

## Specific reading

### Friends of the Earth guides:

Community Rights Resource Pack:

<http://www.foe.co.uk/resource/local/planning/resource/index>

Retail policy and local development frameworks

[http://www.foe.co.uk/resource/briefings/ldfs\\_and\\_retail\\_policy.pdf](http://www.foe.co.uk/resource/briefings/ldfs_and_retail_policy.pdf)

Regional policy guide

[http://www.foe.co.uk/resource/guides/rss\\_2nd\\_edition.pdf](http://www.foe.co.uk/resource/guides/rss_2nd_edition.pdf)

Getting climate change targets into your local development framework

[http://community.foe.co.uk/resource/guides/bigask\\_actionpack\\_five.pdf](http://community.foe.co.uk/resource/guides/bigask_actionpack_five.pdf)

### Other:

Local Development Frameworks and Development Plans

[http://www.planning-inspectorate.gov.uk/pins/appeals/local\\_dev/index.htm](http://www.planning-inspectorate.gov.uk/pins/appeals/local_dev/index.htm)

The Soundness test for development plans and SCIs

[http://www.planning-inspectorate.gov.uk/pins/appeals/local\\_dev/Soundness\\_of\\_DPD.htm](http://www.planning-inspectorate.gov.uk/pins/appeals/local_dev/Soundness_of_DPD.htm)

## Planning Policy Statements

Planning Policy Statement 1: Delivering Sustainable Development

<http://www.communities.gov.uk/publications/planningandbuilding/planningpolicystatement1>

Planning Policy Statement: Planning and Climate Change - Supplement to Planning Policy Statement 1

<http://www.communities.gov.uk/publications/planningandbuilding/ppsclimatechange>

Planning Policy Statement 3: Housing

<http://www.communities.gov.uk/publications/planningandbuilding/pps3housing>

Planning Policy Statement 6: Planning for Town Centres

<http://www.communities.gov.uk/publications/planningandbuilding/pps6>

Planning Policy Statement 7: Sustainable Development in Rural Areas

<http://www.communities.gov.uk/publications/planningandbuilding/pps7>

Planning Policy Statement 9: Biodiversity and Geological Conservation

<http://www.communities.gov.uk/publications/planningandbuilding/pps9>

Planning Policy Statement 10: Planning for Sustainable Waste Management

<http://www.communities.gov.uk/publications/planningandbuilding/planningpolicystatement10>

Planning Policy Statement 11: Regional Spatial Strategies

<http://www.communities.gov.uk/publications/planningandbuilding/pps11spatial>

Planning Policy Statement 12: Local Development Frameworks

<http://www.communities.gov.uk/publications/planningandbuilding/pps12>

Planning Policy Statement 22: Renewable energy

<http://www.communities.gov.uk/publications/planningandbuilding/pps22>

Planning Policy Statement 23: Planning and Pollution Control

<http://www.communities.gov.uk/publications/planningandbuilding/planningpolicystatement23>

Planning Policy Statement 25: Development and Flood Risk

<http://www.communities.gov.uk/publications/planningandbuilding/pps25floodrisk>