

**Friends of
the Earth**

Regional Spatial Strategy

a blueprint for justice and sustainable
development in the English regions

2nd edition, March 2006

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INTRODUCTION

This policy brief is intended to be the spatial expression of Friends of the Earth's vision of a sustainable and environmentally just society. It provides a set of clear spatial policies which can help deliver sustainable development in the English regions. Its aim is to provide a resource for communities, campaigners and planning practitioners who want to achieve a positive future for their regions. The policy objective of the document is focused around the three vital challenges for spatial planning; dealing with climate change, promoting new kinds of sustainable economic growth and delivering change in a way that is fair and environmentally just for all sections of the community.

SECTION A: THE SPATIAL DIMENSION

- I. Friends of the Earth believes the planning system is a vital way of delivering sustainable development by ensuring that we build the highest quality development in the right locations without compromising environmental limits. We welcome the new 'spatial-planning' approach which should allow a range of strategies to be integrated so that society can more effectively deal with critical issues such as climate change and poverty. It is vital that this regional spatial approach is also seen in the wider context of UK spatial development so that progress of one region is not at the expense of others.
- II. Current Government policy does not provide this national framework resulting in a situation which prevents an effective response to the wider pattern of unsustainable pressures and growing regional inequalities. The current pattern of regional development is often described as being unequal because of differing economic growth (as expressed by GDP) between regions. But in fact the problem could be better described as being one of disparities between a) the incomes and opportunities offered to people because of where they live; b) the extent to which key environmental limits (such as water resources and air quality) are being breached and c) the fact that the poorest are often located in the areas where the environment is the most degraded.
- III. Furthermore there are profound social and environmental inequalities which exist even within relatively prosperous regions. This demonstrates that having an aim of regional GDP growth can ignore the needs of these communities and does not deliver the right inclusive vision of sustainable development.
- IV. If the national objective is to ensure a better quality of life for all while living within environmental limits (as it should be) then simply promoting competition between regions or boosting GDP growth in those that are 'behind' will not address the problems.

- V. Friends of the Earth advocates a national spatial framework within which the position and needs of individual regions, and the opportunities for their future development, must be set. The purpose of this framework should be to avoid the negative competition between regions for crude GDP economic growth, and to address the lack of a proper response to 'North-South' disparities. The national spatial framework would begin to apply a broad restraint policy in the areas where environmental limits are exceeded (for example much of the South East), while promoting sustainable regeneration in other regions where there is greater “headroom” for development before environment limits are breached and where social need is the greatest (for example in areas within the North and West).

Public participation in regional planning

- VI. The new legal status of Regional Spatial Strategy (RSS) and the abolition of democratically accountable Structure Plans create a strong imperative to place public participation at the heart of regional planning. We are concerned that there is lack of information about the regional planning process, with many communities in the regions completely unaware of the review of RSS. We also strongly object to the exclusive ‘invitation only’ model of testing regional policy. We believe there should be a right to be heard at examinations in public (EIP) for all those who have made a written objection. In the interim we expect clear criteria to be made public on how participants are selected for the EIP. We hope and expect that no party will be unreasonably refused a right to speak.
- VII. Friends of the Earth is committed to a planning system which is fair, open and accountable for all participants. The perception that regional policy-making is open only to a limited number of stakeholders damages the public legitimacy of planning and inevitably means that the policy in regional guidance is often perceived as being imposed on local communities against their will. The Regional Planning Body (RPB) should do all that it can to create a participative process to combat this perception. In particular each RPB should publish a clear statement of how it intends to promote participation in the draft RSS so that effective community engagement can be delivered and monitored.

SECTION B: FRIENDS OF THE EARTH'S SPATIAL VISION FOR THE REGIONS

1. Sustainable development

Sustainable development is a core priority for all UK decision making.

- 1.1 The Government has made it clear that sustainable development is the “core principle underpinning planning”. The Planning and Compulsory Purchase Act 2004 (PCP Act) has created a new statutory duty on policy makers to contribute to the achievement of sustainable development. (PCP Act 2004 section 39, PPS 1 Paragraph 3, PPS 11 Paragraph 1.7) PPS 1 also empowers the contents of the UK Sustainable Development Strategy 2005 (PPS 1 Paragraph 13 (i)) so that regional and local decision makers must have regard to its objectives. PPS 1 states that “Development plans should ensure that sustainable development is pursued in an integrated manner, in line with the principles for sustainable development set out in the UK strategy.” Overall, sustainable development is a core purpose at all levels of Government decision-making. The Government’s new Sustainable Development Strategy published in March 2005 states that “sustainable development is a priority shared by all Government departments.”

What is sustainable development?

- 1.2 The Government’s new sustainable development strategy in 2005 contains 5 guiding principles for all policy:

- Living within environmental limits
- Ensuring a strong, healthy and just society
- Achieving a sustainable economy
- Promoting good governance
- Using sound science responsibly.

- 1.3 These principles build on the previous sustainable development strategy, however there are two crucial changes which have major implications for decision makers.

- **Quality growth**

First, the strategy is clear that the economic objective is now to promote a “strong, stable and sustainable economy”, replacing the previous economic objective “maintenance of high and stable levels of economic growth”. In effect this is recognition that increasing the quantity of economic activity (i.e. GDP growth) is not the overriding economic goal, and that the quality of economic activity is critical. This new emphasis reflects the Treasury’s position that “quality of growth matters, not just quantity” and also Tony Blair’s comments that “success has been measured by economic growth – GDP – alone. We have

failed to see how our economy, our environment and our society are all one. And that delivering the best possible quality of life for us all means more than concentrating solely on economic growth”ⁱ.

- **Integration not trade-off**

Second, the strategy is clear that these principles are to be met together, and not ‘traded-off’ or ‘balanced’ against each other. This was perhaps the greatest failure of implementation of the previous strategy, where many decision-makers assumed that progress on one aim meant that adverse effects on other aims were a price worth paying. The new strategy explicitly states “although the 1999 strategy stressed that...objectives had to be pursued at the same time, in practice, different agencies focused on those one or two most relevant to them. So a new purpose is needed to show how Government will integrate these aims.”

Delivering sustainable development through spatial planning:

Core Principles

1.4 Planning has a vital role in delivering sustainable development by promoting the highest quality forms of development in the most appropriate locations. PPS 1, paragraph 13 (ii), requires that “Strategic planning policy should seek to deliver the 5 principles of sustainable development”.

1.5 Friends of the Earth recommends the following policy statement as the overarching policy objective of RSS:

“It shall be the principal objective of the Regional Spatial Strategy to deliver sustainable forms 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 must enshrine the five central sustainable development principles of:

Living within environmental limits - respecting the limits of the planet’s environment, natural resources and biodiversity to improve our environment and ensure that the natural resources for life are unimpaired and remain so for future generations.

Ensuring a strong, healthy and just society - meeting the diverse needs of all people in existing and future communities, promoting personal wellbeing, social cohesion and inclusion and creating equal opportunity for all.

Achieving a sustainable economy - building a strong, stable and sustainable economy which provides prosperity and opportunities for all, and in which environmental and social costs fall on those who impose them (polluter pays) and efficient resource use is incentivised.

Promoting good governance - actively promoting effective, participative systems of governance in all levels of society, engaging people’s creativity, energy and diversity.

Using sound science responsibly - ensuring policy is developed and implemented on the basis of strong scientific evidence, whilst taking into account scientific uncertainty (through the precautionary principle) as well as public attitudes and values.

Integration

- 1.6 The new sustainable development strategy should lead to a thorough re-evaluation of traditional notions of planning decision-making and in particular the need to integrate rather than ‘trade off’ or ‘balance’ the objectives of economic growth, environmental protection and social justice. Despite the rhetorical power of the notion of sustainable development reflected in current national policy, regional strategies and Local Development Frameworks (LDFs) often continue to uphold short term economic growth over all other considerations. This position, which is often based on unsustainable investment in a road and aviation infrastructure, is not only contrary to principles of PPS 1 and the new SD strategy 2005, it also fails to appreciate the economic benefits of high quality environments and the increasing economic and social costs of environmental degradation. These costs are evident in terms of localised pollution problems on human populations and in the longer term the global consequences of, for example, climate change. Planning policy needs to take on board the new thinking and imperatives in the new SD strategy. The Regional Spatial Strategy offers an opportunity to enshrine the newly updated concept of sustainable development which can identify and prevent these long-term costs. A mechanism to promote integration is proposed in section 1.8 – 1.12 below.

Governance

- 1.7 Planning also has a crucial role in delivering good governance – through planning processes which are democratic, open and fair. In practice this requires a system which appreciates the intrinsic value of public participation and seeks to meet, and where possible exceed, the standards of the Aarhus convention (The UK is a signatory to the ‘UNECE Convention on Access to Information, Public Participation on Decision Making and Access to Justice in Environmental Matters’, 1998). We note the Government has recognised the intrinsic value of participation in planning in the policy statement ‘Community Involvement in Planning: the Government’s Objectives (ODPM 2004)’.

Strategic development options

- 1.8 The requirement to integrate the five principles of sustainable development means assessing packages of development options against all these principles, rather than assume that if it delivers on one of them this is acceptable.
- 1.9 We propose that all policy packages (like regional economic strategies), and larger individual policies (like regional energy strategies or major infrastructure proposals) be assessed against each of the elements of the main economic, social and environmental principles of sustainable development [Good governance and effective participation, (principle 4) and sound science (principle 5) must underpin all decisions].
- 1.10 A first assessment of this sort has been done by Roger Tym and Partnership in a report for the South East Regional Assembly, where they analysed the Aviation White Paper against 13 main criteria encompassing environmental, social and economic principles. They assessed the White Paper using the following grid:

	Major negative impact	Negative impact	Neutral/no significant impact	Positive impact	Major positive impact
Environmental theme - Proposals reflect the fact that:					
We live within environmental limits?	✓				
Resources are limited		✓			
Biodiversity is limited		✓			
Social theme - Proposals' effects on:					
Health		✓			
Wellbeing		✓			
Social Cohesion		✓			
Social inclusion			✓		
Justice (effects on other, poorer societies)	✓				
Economic theme - Proposals ensure that:					
A strong economy is encouraged				✓	
Environmental and social costs fall on those who impose them	✓				
Efficient resource use is incentivised	✓				

1.11 Friends of the Earth advocates that:

- **This assessment is used to determine whether policies or developments meet and integrate the 5 sustainable development principles.**
- **There is a strong presumption against any development, proposal or policy package which scores a “major negative impact” rating on any of the 13 economic, social or environmental criteria, to prevent damaging trade-offs.**
- **Policy should proactively help to bring forward more development proposals with multiple “major positive impact” ratings.**

1.12 We advocate this type of qualitative approach for three reasons:

- It is not possible to do an adequate direct comparison of many of the different types of impacts. Current approaches to doing so – for example cost benefit analysis which compares all costs and benefits using the common metric of £pounds – have an inherent inbuilt bias against costs or benefits which are hard

to quantify in financial terms. These impacts are often routinely ignored in the final analysis, effectively meaning that 'if it can't be valued, value it as worthless'.

- With a qualitative approach it is possible to escape from the "technocratic trap" where decision-making processes are opaque and understandable only to those who have access to the complex spreadsheets. Qualitative approaches are more easily aligned with and useful to the democratic decision processes now required by both the Sustainable Development principles and by formal Government policies such as Planning Policy Statement 1 (PPS 1).
- Attempting to equate impacts by coming up with one final figure of 'net present value' of £x million for or against a proposal increases the likelihood of one set of principles being traded off against another. Of course, numbers and values of impacts should be used where possible, but to inform the process, rather than dominate the outcome. For example, the UK National Sustainable Development Indicator Set could be used to assess how a proposal would affect each of these 13 criteria. Regional indicators will be essential to complement the national set, for example to ensure that under environmental limits, there is a full appreciation of the environmental capacity of the region so that development operates within established regional environmental limits, affecting policy on resource consumption, energy, equity, transport, ecology, and waste disposal.

Strategic Environmental Assessment (SEA)

- 1.13 The suggested assessment approach above should be fully integrated into the SEA/SA process. SEA allows for a systematic and holistic assessment of development options in line with national and international policy and treaty obligations on important issues such as climate change. SEA also has a crucial role to play in providing comprehensive baseline information and in understanding the range of potential environmental impacts that arise from strategic development options. SEA should require the collection of primary data on issues such as greenhouse gas emissions and should be conducted in the most participative way possible.

Indicators of sustainable development

- 1.14 Any expression of the sustainable development notion must be internally coherent and provide a substantive list of indicators so as to guide the strategic implementation and monitoring of sustainable development. These indicators should be based on a full appreciation of the environmental capacity of the region and as a bare minimum, be informed by the 'Framework Indicators' set out in the UK Sustainable Development Strategy published in March 2005 by the Government. This view of the environmental capacity of the region should lead to a more sophisticated method for target-setting to ensure development operates within established environmental limits on key issues such as Co2 production. Based on these targets, indicators should be developed in the areas of land, primary resource consumption, energy, equity, transport, ecology, and waste disposal. Such indicators should enable the effective implementation of targets and reflect the national and global responsibility of the region to planetary well being.

2. The sequential approach

2.1 Adopting a sequential approach to development in the region is a key way of implementing the planning principles which flow from the imperative for sustainable development. Such a sequential approach is endorsed in Planning Policy Guidance 3 (PPG 3), PPG13 and PPS 6 and constitutes the overriding policy test for all forms of development. Clearly any overarching policy test must be the first and pre-eminent criteria in the consideration of all development proposals. In this regard we note that PPS11 requires RSS to provide a 'clear strategic framework' (paragraph 1.5). Friends of the Earth recommends that the sequential test is the primary criteria for the evaluation of developments in all policy areas in order to effectively uphold the principles of sustainable development.

2.2 **In order to achieve sustainable development and travel patterns and to protect and conserve areas of recognised environmental and amenity importance, planning authorities in each part of the region should adopt the following sequential approach 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.**

2.3 **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 following criteria should be applied systematically in establishing the suitability of individual sites:**

- **the degree to which the location contributes to climate change reduction targets**
- **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 regions' 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 regions' cultural resources. Local authorities should recognise the contribution of heritage features to the social and economic regeneration of the region. 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 parts of the region 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.**

3. Green belt policy

- 3.1 Friends of the Earth strongly supports the retention of existing green belt designations and their selective expansion where this would help deliver more sustainable patterns of development. Green belt policy has been outstandingly successful in delivering its prime objective of urban containment and is one of the best understood and most popular planning measures with the public. Green belts continue to provide access to open space for the urban population and play a key role in inner city regeneration. Friends of the Earth is opposed to any relaxation of green belt policy unless there are exceptional localised circumstances.
- 3.2 There has been a growing emphasis on the relaxation of green belts to meet sustainable transport objectives. This policy shift is based on the single assumption that urban containment has resulted in unsustainable development beyond green belt designations and consequently unsustainable travel patterns. Nowhere has this assumption been adequately tested. There is in fact a complex relationship between green belt designations and the many other factors which have promoted unsustainable travel patterns. (Transport Corridors: Blessing or Blind Alley, CPRE, March 2000). These factors relate to the general decentralisation of urban populations during the twentieth-century, resulting partly from the increased affluence of the general population and partly from the perceived decline of the quality of urban life.
- 3.3 The core objective of green belt policy, established in PPG 2, is to deliver urban containment and prevent urban coalescence. The objective of sustainable transport should not automatically compromise well established planning objectives which are key to the identity and sustainable development of the urban fabric of the region. This is particularly the case when the benefits of the relaxation of green belt for improving transport patterns is poorly understood and may have only marginal benefit. It is also unclear as to what opportunities may exist in practice for significant reviews of green belt designations without compromising the objectives of PPG 2.
- 3.4 As a result of these factors, Friends of the Earth recommends the following policy statement:

The principle of a green belt is a clearly established and successful strategic planning policy. The contribution of green belt in preventing urban coalescence and stimulating sustainable urban regeneration implies that consideration should be given to new green belt designations in the region. Any review of green belt designations should be based on a clear burden of proof that such changes would actively promote all the objectives of sustainable development. Any review should not undermine the need to prevent urban coalescence or the objectives of green belt set out in PPG 2 and specifically the detailed definition of the purpose of green belt laid out in paragraph 1.5ⁱⁱ.

4. Climate Change

“Climate Change is the most severe problem we are facing today”

Sir David King UK Government's chief scientific adviser, 2004

- 4.1 There is a wide ranging scientific consensus that our climate is changing and that these changes will intensify with potentially catastrophic implications for economies, human societies and natural environments all over the world. While the science is well documented, and both actual and potential climate change impacts are increasingly well understood, there are significant gaps in the perceptions of the general public and policy makers as to the urgency required to address this crisis.
- 4.2 Spatial planning has a major and positive contribution to make in meeting this challenge by promoting policies which reduce the threat of climate change by:
- promoting the highest standards of resource and energy efficiency in new development so as to reduce carbon dioxide (CO₂) emissions arising from construction and use
 - requiring land-use patterns that reduce the need and the propensity to travel by car
 - vigorously promoting small and large scale renewable energy projects
 - restricting development which has a major negative impact on CO₂ emissions
 - adapting to the harmful impacts of climate change.

The Government's response to climate change

- 4.3 The Government has set or agreed a number of targets to reduce releases of greenhouse gases. They include:
- Reduce the UK's carbon dioxide emissions by 20% from a 1990 baseline by the year 2010.
 - Reduce carbon dioxide emissions 'by some 60 per cent by about 2050 with real progress by 2020', as recommended by the Royal Commission on Environmental Pollutionⁱⁱⁱ
 - As part of the Kyoto Protocol, the UK has also agreed to reduce greenhouse gas emissions by 12.5% below 1990 levels by 2008-2012
 - In March 2005 EU Heads of State agreed greenhouse gases must be reduced by 15-30 per cent by 2020 from 1990 levels^{iv}
 - Produce 10 per cent of energy from renewable sources by 2010 and 15 per cent by 2015, with an aspiration of 20 per cent by 2020
 - Provide 10,000 MW of combined heat and power by 2010.

(Note: Chapter 4, of the UK sustainable Strategy (Defra 2005) reproduces the full range of the UK Government's international and domestic CO₂ reduction and renewable energy generation targets)

- 4.4 Some of the emissions reduction targets are for all greenhouse gases, while some are for CO₂ only. While our target under the Kyoto Protocol relates to the reduction in emissions of the six main greenhouse gases – carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs) and sulphur hexafluoride (SF₆) - the UK Government decided to set national goals for just one of these gases, carbon dioxide. This is because carbon dioxide is by far the most important of the six gases, and will be responsible for about two thirds of the expected future climate change. It is also one of the more difficult gases to control⁹.
- 4.5 As well as setting targets, the Government has sought to address climate change through a number of policy initiatives. In planning guidance, tackling climate change is identified as a priority in Planning Policy Statement (PPS) 1: Delivering Sustainable Development; with further reference in PPS 7: Sustainable Development in Rural Areas; PPS 9: Biodiversity and Geological Conservation; PPS 11: Regional Spatial Strategies; PPS 22: Renewable Energy; PPS 23: Planning and Pollution Control; and forthcoming PPS 25: Development and Flood Risk.
- 4.6 PPS 1 Makes clear that 'Regional Planning Bodies and local planning authorities should ensure that development plans contribute to global sustainability by addressing the causes and potential impacts of climate change' (paragraph 13 ii).
- 4.7 In addition to the general requirement in PPS 1 for planning bodies to deal with climate change the Government also gives standing to the UK Sustainable Development Strategy as material to the planning process. Paragraph 13 (i) of PPS 1 states, 'Development plans should ensure that sustainable development is pursued in an integrated manner, in line with the principles for sustainable development set out in the UK strategy.' In understanding the implications of sustainable development for strategic planning, Regional Planning Bodies must fully consider the UK strategy which in turn reflects our international and national treaty and policy obligations on climate.

Failure of current policy

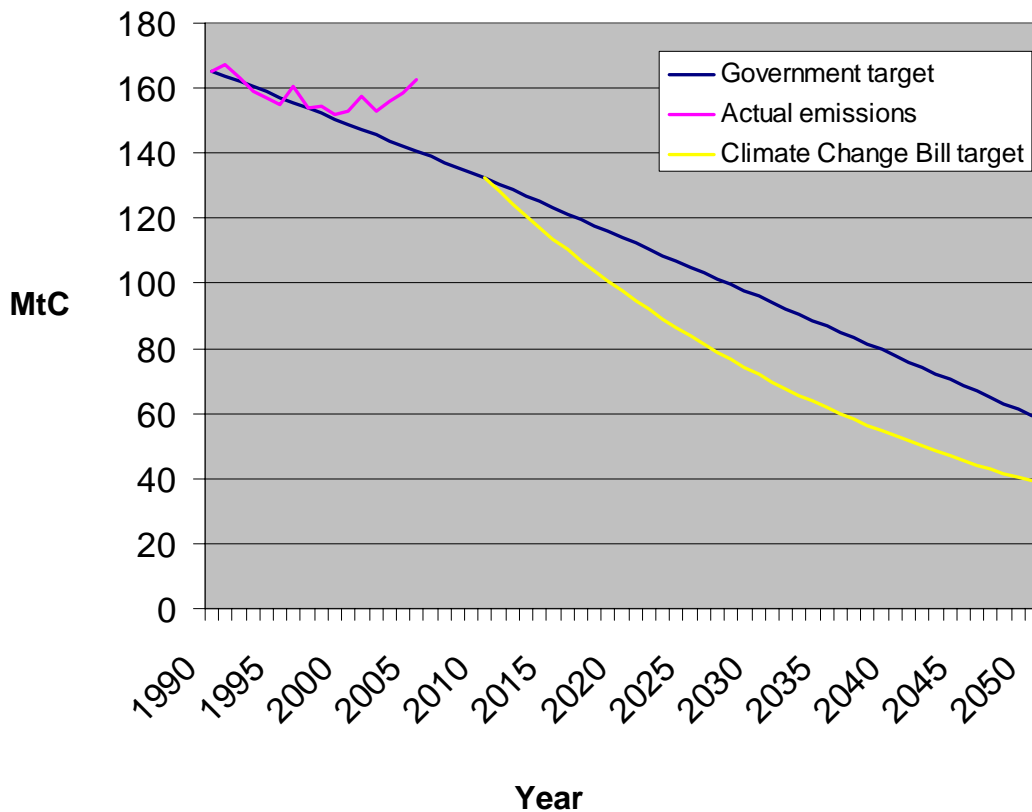
- 4.8 Despite these clear intentions, current national and regional spatial policy is failing to deal effectively with climate change because:
- There is a failure at regional and local level to recognise that climate change is a 'special' consideration for the planning system which may often need to take a pre-eminent place in regional and local policy and in development control decisions. In this sense climate change is the 'first amongst equals' of considerations in the planning system.
 - There has been an over-emphasis in regional planning policy on adaptation rather than avoidance and reduction. Spatial policy must ensure that while proper measures are taken to deal with adaptation the first priority must be to avoid worsening climate change, by making decisions which reduce carbon dioxide

emissions. While there are a series of detailed adaptation measures which RSS should address the focus of this briefing is on avoidance.

- There has been a false assumption that distant targets for reducing carbon dioxide emissions will be enough to avoid the most damaging impacts of climate change, and can be dealt with at some undefined point in the future – the ‘Not in My Term of Office’ syndrome.

4.9 Despite Government targets for a 60% cut in carbon dioxide levels by 2050, in recent years we have not only made no progress towards this target, we have gone backwards - emissions have risen significantly since 1997 and are still rising (see ‘actual emissions’ line of graph below).

Graph 1 – Possible carbon reduction pathways



This graph shows the actual emissions from the UK, compared to the line of reduction required to meet Government targets (if we take a linear approach), compared to the suggested reduction pathway of Friends of the Earth under the Climate Change Bill.

- 4.10 Although unsustainable trends are often acknowledged in strategic planning, the will to tackle them is often weak, and at best compromised targets are set to slow the trend before reversing it at some future date.
- 4.11 With CO₂ emissions and climate change, such an approach is wholly inadequate. The problem is not merely that we might miss the 2050 target, but that the pathway we take to it could mean that even meeting it was not enough. Carbon dioxide persists in the atmosphere for many years, and so the climate impact felt in 2050 will be determined far less by the level of emissions in 2050 than by the cumulative level of emissions up to 2050. If we carry on with emissions as usual – or worse, rising emissions – in the hope that a new innovation or invention will magically cut emissions in 2049 to the level required to meet the target, we will not have succeeded in stopping dangerous climate change, but will have emitted way beyond prudent limits of what the climate can take well before we are anywhere near that target date.
- 4.12 This also means that unless we start making cuts in the near future, cuts further ahead will have to be far more severe. Using data from the International Panel on Climate Change, Friends of the Earth has calculated that if the UK is to make its fair share of reductions to prevent atmospheric concentrations of carbon dioxide reaching dangerous levels, we will need to cut emissions by 3% every year to 2050.
- 4.13 In strategic planning terms, 2050 is not that far away. The current round of Regional Spatial Strategies are to cover the period from 2005/6 to about 2026, requiring them to take us beyond “real progress by 2020” (Energy White Paper 2003), and halfway to the required cut of 60% by 2050. Delay is inexcusable: there are no rational grounds to suppose that cuts will be cheaper, easier or more politically palatable to deliver in future decades than they are now. Indeed the opposite may be the case: as shown in graph 1, it is the path taken between now and 2050 that has the greater influence in determining the severity of future climate change impacts than does the actual level of cut achieved by 2050. So the more action is delayed now, the more stringent will be the action required in future.

A spatial policy to avoid dangerous climate change

- 4.14 Consistent policy measures are required across all sectors to ensure we deliver effective action on climate change. The only high level statutory policy mechanism which can deliver across the country and across sectors is Regional Spatial Strategy (RSS). As such RSS is the key spatial response to climate change. The RSS should contain an overarching policy for the abatement of further impacts through CO₂ reduction policies. Spatial policy at regional and local level should also acknowledge the cross cutting impact of climate change, affecting specific areas such as housing, energy, transport, agriculture, forestry and waste. RSS must make sure that LDFs prioritise action to reduce the threat of climate change in line with paragraph 13 (ii) of PPS 1 by ensuring that policies:

‘reduce energy use, reduce 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’^{vi}.

The development of detailed RSS climate change avoidance policy should proceed through the logical sequence of:

- establishing robust base line data on greenhouse gas emissions
- detailed analysis of the potential impacts of new policy options assessed against baseline conditions
- policy action to reduce emissions in line with reduction targets
- policy action to adapt to the consequences of climate change.

4.15 An emissions inventory is essential to climate action planning. It should audit or model past and present CO₂ emissions by sector as well as future projected emissions. Without all these data the trajectory of change will be unclear and it will be impossible to determine priorities for action.

Strategic Environmental Assessment (SEA) and climate change

4.16 SEA has a crucial role to play in providing comprehensive baseline information and in understanding the range of potential climate change impacts that arise from strategic development options. In view of its overriding importance (and in case of doubt on this point, see the quote from the Government's chief scientist at the head of section four, page 13 of this briefing), the process of sustainability appraisal which incorporates SEA must explicitly identify climate change as the single most important issue in the scoping process. This will often require the collection of new primary data on greenhouse gas emissions. DEFRA have commissioned statistics of carbon dioxide emissions for local authority and Government Office Region areas^{vii}, although these are presently a set of experimental calculations. The SEA directive requires detailed and robust analysis of all significant environmental impacts of strategic plans; clearly climate change impacts will be foremost among those. More detail on the SEA directive can be found from the resource section of our planning web pages at www.YourPlanningRights.co.uk.

Core policy principles for avoidance

4.17 Effective climate change avoidance policy has three components:

- A. Regional carbon reduction targets**
- B. Low or zero emission development principles**
- C. Restricting climate damaging development.**

A. Regional carbon reduction targets

4.18 RSS must contain targets which assist in the delivery of the necessary reductions required to prevent dangerous climate change. As we argue above, existing targets are not enough to prevent dangerous climate change; by concentrating solely on an emissions target in a single year, they fail to address the cumulative emissions that

will determine the extent of climate change. We propose the Government should set a legally-binding target for annual reductions in carbon dioxide emissions of 3% per year. Even if the precise quantification of these reductions remains disputed, it would be ridiculous if RSS was not at least consistent with both the UK's international treaty obligations and national climate reduction policy. These obligations should be regarded as an absolute minimum policy floor and not a policy ceiling.

- 4.19 There are two significant developments in planning policy which reinforce the requirement to deliver on national and international climate change obligations:
- Firstly the Strategic Environmental Assessment (SEA) Directive requires in Article 5 and Annex 1 that environmental objectives established at international, community or national level which are relevant to the plan (i.e. the RSS) are taken into account during the preparation of policy. There can be no doubt that the Kyoto Protocol and the UK's own national targets fall firmly inside this category and must be considered as a key objectives in the plan making process.
 - Secondly, as already cited, PPS1 requires Regional Planning Bodies to "ensure that sustainable development is pursued in an integrated manner, in line with the principles for sustainable development set out in the UK strategy".
- 4.20 **Consequently RSS must enshrine an explicit climate change reduction target which at the very least delivers on the UK's national and international policy and treaty obligations, and should assist in following a reduction pathway that ensure the UK makes its fair share of cuts in order to keep climate change below critical thresholds.**

Establishing a regionally specific CO₂ reduction target

- 4.21 In order to meet the short term Government target of a 20 per cent CO₂ reduction by the year 2010 urgent action is required. We recognise that there may be specific regional issues which might influence effective target-setting: for example some regions are net exporters of energy. Reduction targets should therefore be based on the model established in the adopted Yorkshire and Humber RSS. These are based on energy consumption and reflect a fairer and more realistic basis for action than targets based on energy production. Friends of the Earth strongly supports the approach on target setting in the Yorkshire and Humber, which has been accepted by ODPM in adopting that RSS, and which should be used as the template for all RSS documents.

Box 1 - Yorkshire and the Humber RSS climate change policy

Policy S5 - Climate change

Local and regional authorities and agencies and others should:

- a) Include policies and proposals in their development plans, local transport plans, strategies and investment programmes to help reduce the Region's greenhouse gas emissions by at least 20% below 1990 levels by 2010 and by at least 25% below 1990 levels by 2015**
- b) Take into account the land use implications of the predicted impacts of climate change on their area and plan for both the successful adaptation to the resulting effects and maximisation of potential economic, environmental and social opportunities in land use terms.**

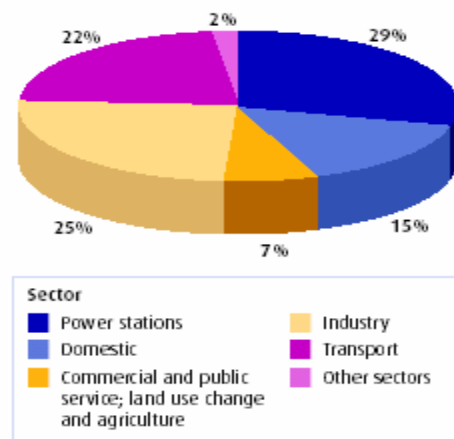
4.22 It is important to note that the figures contained within the Yorkshire and Humber policy would not deliver the 3% annual CO₂ reduction which Friends of the Earth believes is essential (see Graph 1, page 15). We therefore propose a 30% reduction by 2015 as the appropriate target. This would also fully meet the target as agreed by the EU Heads of State in March 2005.

Cross sectoral action

4.23 RSS should examine the translation of the headline target into individual targets for specific sectors. The UK Sustainable Development Strategy indicates that policies to reduce emissions fall under six broad sectors:

- the energy supply industry
- business
- transport
- households
- agriculture, forestry and land-use
- the public sector.

Figure 1: CO₂ emissions by source, 2004*



Source: UK Sustainable Development Commission

4.24 RSS should promote CO₂ reduction policies across all these sectors and consider the adoption of a separate Climate Change Action Plan which draws together strategic policy, partnership working and funding mechanisms which can help deliver effective change.

4.25 Prioritising action in those sectors with a large and growing CO₂ profile, such as transport, is clearly a priority. Chapter 5 provides detailed policy guidance on reducing the climate change impact of transport. Friends of the Earth also recognises that action in some of these sectors implies policy which goes beyond narrow land use issues. However, RSS now has a broader 'spatial' scope and should, for example, set out long-term strategic policy on energy generation and consumption which reflects the aspirations of the Energy White Paper in relation to CO₂ reduction.

4.26 **In order to achieve the overarching regional CO₂ reduction targets RSS should establish specific sectoral targets to reduce emissions over the plan period.**

Box 2 - The Yorkshire and Humber Climate Action Plan

Regions should consider the adoption of a Climate Change Action Plan, as is being undertaken in Yorkshire and the Humber. This aims to: *“provide the region with the framework to respond to the threat of climate change. It will utilise and expand our knowledge of the regional impacts of climate change and develop strategies to cope with these impacts. Concurrently, it will work towards long-term reductions in greenhouse gas emissions from the region to reduce our impact on a global problem... By taking this approach, this plan will enable significant steps to be made over the next 3-5 years towards ensuring the region is both prepared for the likely impacts of climate change and to achieve 60% greenhouse gas reductions by 2050.”*

Monitoring and review

- 4.27 RSS must contain a commitment to regular monitoring and reviews of climate reduction policy. This is because enhanced scientific knowledge, and/or international obligations, may lead to revision of existing targets, and more stringent (or even, though it is extremely unlikely, less stringent) annual reductions will be required.
- 4.28 Regional Planning Bodies need therefore to be alive to the potential that additional and tougher targets may be required to be met in the short – medium term. For example, increasingly scientists are warning that carbon dioxide concentrations need to be kept below 450 parts per million (ppm) or even 400ppm as opposed to the 550 ppm modelled by the Royal Commission. These lower concentrations would require greater reductions in carbon dioxide (see Box 3 on the following page).
- 4.29 When drawing up Regional Spatial Strategies, regional bodies also need to recognise that climate change policy is fluid at present. The Government is due to publish its new climate change programme in November 2005; the Government may also require year on year reductions as a response to parliamentary pressure and a Climate Change Bill which demand cuts of 3 per cent per annum.

Box 3 - The 2 °C stabilisation target

Based on current understanding of 'steady' and 'rapid' impacts, organisations such as the International Climate Change Taskforce suggest a long-term target to prevent global average temperatures rising more than 2°C above the pre-industrial level. While some impacts are expected below this level, above it impacts on ecosystems, water, and food may rise dramatically. To inform policy, targets must be translated into emissions reductions but science can not link these precisely. The 2°C target has guided EU policy since 1996, when it was linked to a CO₂ level stabilised at 550 ppmV. The UK's domestic 2050 CO₂ reduction target is consistent with that calculated as the UK's contribution to the overall global emissions reductions required to stabilise at 550 ppmV.

Recent evidence indicates that CO₂ levels need to be kept below 400 ppmV to be fairly certain of limiting warming to 2°C. As the CO₂ level is now nearing 380 ppmV and rising at over 1.5 ppmV per year, this cannot be done without urgent, vigorous global action to cut emissions. The UK would have to cut CO₂ emissions to over 80% below 1990 levels by 2050.

Parliamentary Office on Science and Technology: Post note on Rapid Climate Change, July 2005, number 245

<http://www.parliament.uk/documents/upload/postpn245.pdf>

B. Promoting low and zero carbon development principles

- 4.30 In order to assist in the achievement of carbon reduction targets RSS should promote a range of policy measures to ensure that new development does not add to the atmospheric burden of CO₂ over its life-cycle. Much of the building stock that exists today has poor energy and resource efficiency, yet will still be in use in 2050 and beyond. New build therefore has to be of a high enough standard to compensate for this deficiency. Measures should however also be considered to promote the retrofit of the existing building stock whenever possible. RSS policy should also identify embedding renewable technology and energy and resource efficiency of existing buildings as a key aspirational spatial policy. The redevelopment of existing buildings provides an opportunity for the planning system to achieve this objective. The RSS can also play a positive part in ensuring other regional strategies promote small-scale renewables and retrofit in their investment decisions.

Energy and resource efficiency

- 4.31 Development Plans offer a significant opportunity to promote the development of resource efficient homes through the inclusion of policies which specify acceptable levels of resource efficiency for all new developments. The Energy Performance of

Buildings Directive (EPDB) requires the setting of minimum standards of energy performance for new-build and buildings undergoing major renovation. The Government is committed to implement this Directive by 2006. While aspects of this agenda are dealt with under Part L of the new Building Regulations, RSS has a major role in setting strategic policy and driving up standards. Energy and resource efficiency must become key considerations in permitting new development or the re-use of existing buildings.

- 4.32 The London Borough of Merton has shown how local authorities can take the lead on tackling climate change through the planning system. The Borough intends to include the following text in their forthcoming Local Development Framework:

The Council will require all developments, either new build or conversion, with a floor-space of 500 m², or one or more residential unit, to incorporate on-site renewable energy equipment to reduce predicted CO₂ emissions by at least 10 per cent.

- 4.33 This approach is supported by PPS22 and should be promoted for all local authorities by its adoption in RSS.

The zero net carbon standard

- 4.34 The aim however must be to reduce greenhouse emissions in the region. So, whilst the aims of the Merton policy above are laudable, it is clear that they do not go far enough - because new developments will continue to add to the overall carbon dioxide emissions. If we are to reduce the region's overall emissions, new build should achieve a zero net carbon standard, meaning that new development does not add any net carbon dioxide emissions during its lifetime. Indeed, where possible development should incorporate renewable energy generation so that it has a net positive energy output after construction.

- 4.35 To aim for a zero net carbon standard may be regarded as a radical step, but the policy is technically achievable, falls inside the remit of spatial planning and is the clear and logical extension of the Government's national policy and international obligations on climate change.

- 4.36 Such development can be achieved by using a range of existing, well-recognised standards which are outlined in more detail in Box 4, page 24. These tried and tested standards, together with on-site renewable generation, offer a 'toolkit' of options from which developers can select their preference to achieve the zero net carbon standard. As the Local Government Association has noted:

'There is no technical reason why all new housing built in the UK should not achieve a zero net carbon standard within a few years. There are already examples of housing in the UK which achieve zero net carbon emissions through combinations of higher energy efficiency and renewable sources for the remaining power.'^{viii}

4.37 Friends of the earth recommend the following policy be adopted in RSS:

- **LDFs should seek to ensure that 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:**
- **A zero waste, zero carbon standard (based on the Z-squared standard) for any large scale housing development.**
- **A minimum of EcoHomes '2006 Excellent' standard for any housing development of one unit or more.**
- **A minimum of BREEAM 'Excellent' for any commercial development.**
- **The development of on-site renewable energy generation capacity.**
- **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 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.**

4.38 The ODPM Select Committee Report (Planning for Sustainable Housing and Communities: Sustainable Communities in the South East Eighth Report, ODPM, 2003) endorsed the Building Research Establishment measure of resource efficiency known as the 'EcoHomes' standard. The Government is currently consulting on the new Code for Sustainable Homes. Friends of the Earth believes that EcoHomes 2006 standard should form the basis of the Code and that RSS and LDFs should incorporate Code Standard into core policy.

Box 4 - An explanation of the standards:

Z-squared standard:

BioRegional, who have been involved with the BedZED community in Sutton, South London, teamed up with WWF on a One Planet Living project. Their planned development in the Thames Gateway will take a zero carbon zero waste approach, so called 'Z-squared'. Friends of the Earth believes that pioneering development projects of this kind must move into the mainstream.

BRE Eco Homes Standard:

The Buildings Research Establishment (BRE) have an environmental impact assessment method for new and existing domestic buildings called EcoHomes. Whilst not perfect, EcoHomes does provide a nationally recognised standard on best practice in environmental design. Because it is nationally recognised the EcoHomes standard can be used by planners to specify the sustainability performance of buildings.

These are both proven standards. A WWF study compared the impacts of developing 200,000 homes to different building standards, including those outlined above, and found that:

"EcoHomes 'Very Good' standard produced a 32 per cent reduction in CO₂ emissions, a 39 per cent saving in water use and up to a 25 per cent reduction in household waste sent to landfill, compared to current building regulations. Z squared standard could achieve a 99 per cent reduction in CO₂, a 65 per cent reduction in water use and 76 per cent reduction in household waste sent to landfill."

The EcoHomes and Z-squared standards are also economically viable. The WWF report, *"One Planet Living in the Thames Gateway"*, shows that: *"...in terms of capital costs and personal expenditure related to the building, purchase and running of a home, the cost of developing to EcoHomes 'Very Good' and Z squared standards would be comparable to, or even cheaper than, the cost of developing to current building regulations... Savings on residents' energy and water bills would offset any increase in mortgage repayments. In fact, if all household expenditure were considered, living in sustainable homes would be cheaper for residents as well as offering significant environmental benefits."*

Promoting medium to large scale renewable energy projects

- 4.39 Promoting the effective delivery of new renewable energy capacity is a vital part of action to reduce climate change. 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 consequences of this are that increasing numbers of local authorities, who have previously had little involvement in the consideration of energy projects, will need to adopt policies and assess applications. It is important to recognise that the term 'renewable energy', encompasses all forms of energy and not just electricity generation. RPBs should consider the setting of regional targets for renewable sources of heat and renewable forms of transport fuels as well as renewable electricity.

Regional targets for renewable energy

- 4.40 RSS must contain an explicit target for the generation of renewable energy which relates to the overall CO₂ reduction targets outlined in paragraph 4.22 above. The Energy White Paper identified renewable technology as a key way of reducing CO₂ emissions and the Renewables Obligation has set at two important targets for the amount of electricity generated from renewable sources, 10% by 2010 ‘with an aspiration to double this by 2020’. The Government has also announced its intention to extend the obligation to 15% by 2015/16^x.
- 4.41 Friends of the Earth supports the incorporation of these national objectives as minimum regional targets for renewable energy. However, RSS should go further to promote renewable energy generation and should also ensure that existing generation capacity contributes to CO₂ reduction. RSS should incorporate the following measures:
- **Bold action in the short term to reduce the growth in electricity demand and, in the medium-term to achieve absolute reductions in demand.**
 - **Introduce policies that will contribute to the delivery of the national target for 20 per cent of electricity requirements, or at least 100 TWh/year, to be produced through renewable power by 2020 (including biomass combined heat and power).**
 - **Boosting combined heat and power (CHP) usage at all scales (from large scale to micro CHP) to ensure that the national target of 98TWh/year by 2020 is delivered (excludes biomass).**
 - **A phased switch from existing coal to new gas CCGT generating capacity, with possibly some upgraded coal capacity retained.**
 - **Ensuring that any coal power plants used during this period are upgraded to best available technology (such as advanced super-critical technology) to boost their efficiency and that the use of sustainably sourced biomass in these plants is increased to the maximum possible extent.**
 - **New or upgraded gas or coal plants should be made “capture & storage ready”.**
- 4.42 Friends of the Earth believes that renewable energy targets should be regularly reviewed and revised upwards (if they are met). We would suggest, given the pace of change in the development of renewable technologies, that the RSS should stipulate that reviews should be conducted at least every three years.

Locational considerations for medium and large scale renewable generation

- 4.43 The key policy dilemma for RSS 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 our view, renewable energy development, which is of a scale and form that does not damage the intrinsic value of such designations, should be encouraged. However, there should be no

relaxation of the stringent policy tests for all kinds of development in these areas. Outside statutory designations, RSS should provide stronger general encouragement for the development of renewable energy technology by creating a presumption in favour of such development. Such a presumption would send a clear message that development should be encouraged unless there are clearly defined and weighty material considerations to refuse. In striking this balance, it is vital to provide detailed guidance on the criteria that Local Planning Authorities should incorporate into Local Development Frameworks.

International Designated Sites

- 4.44 Friends of the Earth believes that stringent policy tests should apply to renewable energy development which affects international designations. We believe 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

- 4.45 We support 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

- 4.46 We do not believe that buffer zones or local designations should be used unreasonably to refuse renewable energy projects which have clear environmental benefits. However, such 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.

Visual Effects

- 4.47 Assessing the visual impact of development is to some extent a subjective process. However, landscape impact assessment is a long-standing part of the determination of other forms of development, including minerals extraction. Where appropriate, landscape impact assessment should be a key way of understanding the potential impact 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.

Regional priorities for renewable energy

4.48 Development plans should include policies to facilitate the delivery of the indicative targets for renewable energy set out in the RSS. Because of the overwhelming need to deal with climate change there should be a presumption in favour of the development of renewable energy technology. Inside this broad presumption development plans should recognise the need to protect interests of acknowledged environmental and social importance.

C. Restricting climate damaging development

4.49 The promotion of development which delivers net carbon zero emissions will only be effective if there is strong and explicit control over proposals which will be major net producers of carbon. RSS must deal with how development such as a major new transport infrastructure will impact on carbon reduction targets. Aviation provides a stark example of this challenge. Annex 1 contains a detailed analysis of the implications of regional airport expansion for RSS climate change policy.

4.50 While the necessity of meeting the overall climate change reduction target does allow some opportunity for flexibility between sectors it will require a new and rigorous policy test for development which may increase climate change emissions. Friends of the Earth recommends the following policy be incorporated into RSS:

- **There will be a presumption against any development which results in a significant net increase in carbon dioxide emissions.**

Adapting to Climate Change

4.51 Regional and local strategic policy must take into account the predicted impacts of climate change. Adaptation should be embedded at all levels of decision-making so that existing and new development become more robust in the face of severe climate change events and that ecosystems are protected and are more of a possible enhance to allow them to more robustly about to the impacts of climate change. Policy action is also required in the following specific areas:

Flooding

4.52 RSS should address strategic flood risk so that both existing development is not at risk and new development does not exacerbate flood risk. The RSS should:

- **set a framework for local authority maps of flood risk areas with an extended time horizon of 25 years**
- **identify principal areas where flooding issues are likely to be of regional significance, and establish regional policies to discourage inappropriate development in high-risk areas.**

Coastal policy

4.53 RSS should:

- **identify the range of issues across the wider coastal zone**
- **set objectives to protect and enhance the region's coastal resources under conditions of climate change**
- **adopt policies to provide for the long-term sustainability of coastal areas**
- **identify cross-border issues**
- **identify offshore renewables potential (including tidal stream, wave power, lagoons).**

Water

4.54 Climate change is adding significantly to the uncertainties of future supply of and demand for water. The UK Climate Impacts Programme (UKCIP02) scenarios^x show that seasonal distribution of precipitation will change, with wetter winters and drier summers across the UK. A combination of lengthening thermal growing seasons and a decline in summer soil moisture is likely to lead to increased water demands by agriculture and horticulture. Areas that are already experiencing water constraints on development, are likely to find problems exacerbated. RPBs must give strategic consideration to the limits which water management places on development.

Regional and river catchments studies and strategies

- 4.55 All of the English regional climate impacts studies highlight concerns over water resources, supply or management (http://www.ukcip.org.uk/climate_impacts/location.asp) and the issues have had a greater profile in the recent rounds of RSS revision. In England and Wales, Regional Planning Bodies must take account of the Environment Agency Regional Water Resource Strategies, which look ahead 25 years, and which promote flexible options regarding climate change. RSS should also engage with the river basin management plans being drawn up under the Water Framework Directive.
- 4.56 Regional Planning Guidance or Regional Spatial Strategies must include objectives and policies which ensure the water resource implications of new developments are assessed. Where development proceeds, resources should be sustainably managed. This includes policies for new housing, and for other developments such as mineral workings, tourism schemes and energy projects.

5. Transport

Land use, climate change and transport integration

- 5.1 While RSS can require a range of cross sectoral action on reducing carbon emissions there is no doubt the RSS should focus on those sectors that are currently the major contributors to greenhouse gas emissions in the region and relate to its spatial planning role. One of the most important of these is transport particularly because emissions continue to rise from this sector (Cambridge Econometrics, 2003; Climate Change Action Plan, 2005).
- 5.2 The major impacts of transport policies on land use and climate change require that the connection between them is fully considered in strategic policy. There is a range of specific transport issues which must be dealt with in relation to climate change and in particular ensuring that climate change emissions from transport are reduced in line with the targets discussed in section four of this policy brief. Friends of the Earth recommends the following policy:
- 5.3 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.**
- 5.4 Local and regional authorities and agencies should minimise the resource demands of transport by integrating land use and transport so as to reduce the need and demand for travel.
- 5.5 Rising traffic levels are causing major environmental, economic and social problems throughout the country. According to the Government's Progress Report on its 10 Year Transport Plan, traffic levels will rise by 23 - 29% this decade, 29 – 38% by 2015 and 38 – 53% by 2025.^{xi}
- 5.6 The Sustainable Development Commission has commented that with reference to traffic growth that “this is one of the most disturbing and unsustainable trends of our society. These trends are responsible for an increasing share of the total burden of greenhouse gas emissions in the world and in the UK, and they are the cause of much other pollution, noise and congestion”.^{xii}
- 5.7 A transport system increasingly dominated by, and built around, the car is contributing to problems of social exclusion for households without cars. These groups are often the hardest hit by the impacts of the way we travel (traffic levels, pollution, accidents etc), even though they have the lowest rates of car ownership.

- 5.8 Although technology will help reduce emissions from transport, it won't be enough on its own. This is because rising traffic levels will continue to reduce the benefits from technological gains. Friends of the Earth believes that we need to get what we can from technology, but that we must also change how and how much we travel. This means that we have to reduce the volume of traffic on our roads. Friends of the Earth believes that the only way to tackle problems caused by the way we currently travel is to reduce the volume of traffic on our roads by demand management and behavioral change. Research has shown that the application of best current practice in transport could cut car travel demand by up to 33% in large urban areas and up to 10% nationally.^{xiii}

Regional demand management strategy

- 5.9 A demand management strategy has to be the centre of any regional transport strategy, acting as the principal driver for all its other policies, including future management and investment priorities. The requirement to produce a demand management strategy must be identified at the regional level so that local authorities and other agencies can then proceed to implement this via Local Transport Plans, Local Development Frameworks and other mechanisms. Friends of the Earth recommends the following strategic policy for transport:
- 5.10 Regional and local authorities, public and local bodies and service providers will work together to ensure that the level of traffic across the region in 2015 is below the level for 2001. This will be achieved by:
- **reducing the need to travel**
 - **managing the demand for travel**
 - **restricting unnecessary car usage**
 - **significantly extending the provision and quality of public transport**
 - **encouraging cycling and walking for short journeys.**
- 5.11 The Regional Assembly should prepare and start to implement an overarching regional demand management strategy:
- **based on an analysis and forecasting of significant trends, and seeking to achieve determined objectives and outcomes.**
 - **involving the consultation and coordination of regional and local stakeholders.**
 - **incorporating an agreed road traffic reduction objective and target.**
 - **setting a requirement on local authorities to include and implement demand management measures in their local transport plans and report progress annually.**
 - **which the regional transport investment and management priorities should contribute to deliver.**

This policy should be located prominently at the start of the RTS, in order to influence subsequent and more detailed transport policies. Regional policy has an important role to play in preventing destructive competition between neighbouring centres, which has in the past inhibited local authorities from introducing demand management tools such as more stringent parking standards or higher charges.

Hierarchy of transport use

- 5.12 Establishing a hierarchy of transport use through outlining a priority order can be very influential in pushing through sustainable transport policies at the local level. Once included in RSS, it can then be integrated into Local Transport Plans and Local Development Frameworks. Friends of the Earth recommends the following policy:
- 5.13 Local Transport Plans should 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

Roads

- 5.14 Road-building does not provide a medium or long-term solution to traffic problems. The Government has accepted, for example, in the 1998 White Paper 'A New Deal for Transport', that we cannot build our way out of congestion. Research and experience show that in many cases road-building only provides a limited solution or generates additional traffic. For example, when sections of the M25 were widened from 3 to 4 lanes in the mid 1990s, in many cases the additional capacity filled up within a few years. Road-building is often promoted as a means of economic regeneration, but both research and experience show that this is often not the case. New roads may make it easier for firms in an area to get their products and services out, but they also make it easier for firms outside an area to get their products and services in. Friends of the Earth recommends the following policy statement:
- 5.15 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. Regional policy will not commit to supporting any specific infrastructure project where this support might prejudice the outcome of a full Environmental Impact Assessment.

Rail

5.16 Rail has clear environmental benefits over road-based travel. It is also an essential part of a real integrated transport system. On average, travel by train is more efficient and less polluting than travel by car. It is much more efficient and less polluting than flying. Per passenger, emissions of carbon dioxide (the main cause of climate change) are lower for trains than for cars or planes. The rail system should form the spine of a genuine system of integrated transport within a region. If connected with local buses and light rail, and if well served by cycle and walking routes, rail can provide for rapid movement between towns, and within larger cities, in a way that can compete with the car and reduce environmental impact. Friends of the Earth recommends the following policy statement:

5.17 Regional and local authorities and train operators should encourage the development of passenger rail services to provide a real alternative to car use through:

- **improving existing services, particularly local and regional connections between and within regional and sub-regional centres; and**
- **investigating the possibility of extending services through:**
 - i) opening new lines and re-opening disused lines;**
 - ii) opening new stations and re-opening disused stations; and**
 - iii) introducing passenger services on freight-only lines where appropriate.**

Buses

5.18 Buses are the most flexible and widely-used mode of public transport. Almost 6% of all journeys made are by bus. And buses are more important for low income groups, being used for nearly 12% of all trips by the poorest fifth of households (National Travel Survey, 2004). Improvements to bus services in urban areas can bring large increases in patronage. Dublin has greatly improved its bus corridors in and out of the city over the past four or five years with a suite of measures, including improved bus lanes, high quality waiting areas, real-time passenger information and landscaped walkways to access the bus stops. Consequently, bus use has increased by 38%.^{xiv} Friends of the Earth recommends the following policy statement:

5.19 Local Transport Plans should include policies to increase bus patronage across the region by 10% by 2010 through measures which:

- **extend the provision and improve the quality of regional and sub-regional networks of services within and between towns and cities and in rural**

- **areas, including the use of community-based services where appropriate;**
- **provide and improve facilities for interchange with other transport modes;**
- **increase road space dedicated to buses in towns and cities; and**
- **traffic priority measures favouring buses over other road traffic.**

Co-ordination of Public Transport

5.20 Public transport provision needs to be planned and coordinated across whole travel to work areas, which often cross local authority boundaries. RSS should identify areas where cross-boundary co-operation will be beneficial for such measures as through ticketing, smart card technology, bus priority, revenue support, bus quality partnerships, travel awareness projects and so on.

Walking

5.21 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 are walkable by most people. Walking is a particularly important mode for people on low incomes: people in the poorest fifth of households make over 60% more trips on foot than people in the best-off fifth (National Travel Survey 2004). Friends of the Earth recommends the following policy:

5.22 Local Transport Plans should recognise the potential for significant modal shift to walking for short journeys and should aim by 2010 to increase substantially the share of journeys less than 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; and**
- **slowing down traffic through the use of 20mph zones and Home Zones.**

Cycling

5.23 Cycling is seen as a minority mode of transport in the UK, but 42% of all journeys are under 2 miles long and over 68% under 5 miles long (National Travel Survey, 2004), and therefore cyclable by most people. Many people are put off cycling by the speed of other traffic and the perceived and actual danger this poses. Tackling these issues through the provision of quality cycle infrastructure (both on- and off-road) and slowing down other traffic are therefore priorities. Friends of the Earth therefore recommends the following policy:

- 5.24 Local Transport Plans should recognise the potential for significant modal shift to cycling for short journeys and should aim 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 should be achieved by providing a network of cycle-friendly streets and cycle routes in urban and rural areas.**

Charging

- 5.25 Fiscal measures are an important component of demand management. One aspect of this is making drivers think more about whether a journey is necessary and whether to make the journey by car or by another mode by shifting the cost of motoring towards charging for individual journeys. The Government is currently considering the introduction of road-user charging on a nationwide basis, but if this happens, a scheme will not be in place until the next decade. This creates both the potential and the need for action in the interim to help tackle traffic problems, particularly in large urban areas. The Transport Act 2000 gives local authorities the powers to introduce congestion charging or workplace car park charging in their area. Congestion charging in London has worked well in the first year of operation, with the number of cars entering the charging zone falling by 30%, and the number of buses rising by 20%^{xv}. Friends of the Earth recommends the following policy:
- 5.26 Local authorities, particularly in key urban centres, are strongly encouraged to make use of the powers provided by the Transport Act 2000 to introduce new charging initiatives, working individually or collectively as appropriate, as part of an overall policy of travel demand management and also as a means of generating revenue for sustainable transport investment.**

Aviation

- 5.27 The Government's Air Transport White Paper, published in December 2003, supports airport expansion to cater for a forecast growth in passenger numbers from 180 million passengers per annum (mppa) to around 500 mppa by 2030. Expansion on this scale would have huge negative environmental consequences. The House of Commons Environmental Audit Committee has concluded that "if aviation emissions increase on the scale predicted by the DfT, the UK's 60% carbon emission reduction target which the Government set last year will become meaningless and unachievable"^{xvi}. Airport expansion would also aggravate local environmental problems such as air pollution and noise, and could also lead to significant traffic generation. (see 'Growth scenarios for EU and UK aviation: contradictions with climate policy' produced by the Tyndall Centre for Climate Change Research).
- 5.28 The Government requires that airport operators produce airport master plans. There is an expectation that these plans will be incorporated into Local Development Framework. Regional Spatial Strategy should take account of relevant airport master plans produced in accordance with the requirements of the Air Transport White Paper to the extent that they:

- **relate to the planning period of this RSS; and**
- **are consistent with the wider principles and policies of the RSS.**

5.29 However, we believe that the growth proposals in the ATWP (and airport master plans) are not consistent with national policy on sustainable development. Regional Spatial Strategy should also take account of the full range of environmental, social and economic impacts that will be consequential to the developments proposed by those master plans to ensure an outcome consistent with the wider principles of sustainable development supported by this RSS/ RTS. Airport master plans should identify and bring forward proposals to ensure that the public transport share of airport surface access trips is as high as possible.

Investment Priorities

5.30 The RTS is required by Draft PPS 11 to provide “regional objectives and priorities for transport investment and management across all modes to support the spatial strategy and delivery of national transport policies”. Too often this is used simply as an opportunity to identify long lists of largely unsustainable and expensive transport infrastructure schemes, principally road schemes, which are the favoured projects of a particular local authority. These will also not necessarily be the most cost-effective way of achieving the RTS’ transport objectives, where soft measures or demand management may do a better job at less cost. Friends of the Earth recommends the following policy:

5.31 In assessing transport investment priorities, RSS will ensure that proposals focus as much on transport management as investment; and that individual schemes:

- **clearly support the overall spatial strategy and the wider sustainability policies of RSS,**
- **have been developed by a process that is transparent,**
- **clearly contribute to sustainability targets e.g. road traffic reduction, and**
- **can be demonstrated to be cost-effective and value for money.**

6. Economic prosperity and competitiveness

- 6.1 Friends of the Earth believes that sustainable economic progress is an important part of a strategy which seeks to achieve sustainable living patterns across the region. Sustainable economic development will result not from competition between regions but from collaboration which enables all regions to maintain a healthy economy. The region should therefore be aiming to achieve sustainable economic growth which is driven by the needs of the population and which is able to be maintained through a diversified economic base. This suggests a need to rely more on a mix of small scale, indigenous business development and less on large scale inward investment.
- 6.2 Friends of the Earth objects to the assumption that the driver behind the economic development be concerned primarily with measures of economic growth based on GDP per head. While Friends of the Earth supports 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 can often assist in the achievement of the other three SD goals, but often it does 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. The planning system 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.
- 6.3 Currently the focus on the size of the economy still dominates regional policy, with all regions competing with each other to have the largest economy and the highest economic growth rates. However, economic growth should not be regarded as an end in itself. It can often assist in the achievement of the environmental and social sustainable development goals, but often it does not. Indeed some types of economic growth not only damage the environmental and social pillars of sustainable development, but also damage other parts of the economy, for example polluting industry damaging the tourism sector.
- 6.4 The new sustainable development strategy's focus on a 'strong' economy rather than just a 'big' economy should lead to major positive benefits. It should help stop the damaging focus on growth as the predominant economic issue, so that other important economic issues get greater consideration. Doing this should lead to policy which has a much greater emphasis on other crucial aspects of an economy's vitality. This should lead to a stronger economy, as well as economic activity which is less likely to damage the environment and people's quality of life.
- 6.5 To promote a strong economy, Friends of the Earth advocate the following strategic policies:

Promote a diverse regional economy, so that it is not overly reliant on small numbers of sector or employer. In a globalised world with footloose corporations, it is crucial that regions are not overly reliant on sectors which

can up-and-leave at short notice.

- **Promote greater security of regional energy and resource supply, so it is not overly reliant on external resources.**
- **Promote strong links between regional and local businesses,**
- **Promote recirculation of money within the regional economy**

6.6 We stress that these policies are not ‘anti’ economic growth – in fact they would lead to economic growth. The distinction is that under this approach economic growth is no longer the prime goal for policy, but instead an outcome from pursuing a strong economy which meets peoples’ needs and stays within environmental limits. Removing the predominance of economic growth at a regional level is the major requirement for getting environmentally and socially acceptable growth.

Identifying employment land

6.7 Friends of the Earth believes that the allocation of any new sites for employment should contribute to the overall objectives of delivering sustainable developments by promoting inclusive mixed used development which reduces the need for travel, uses previously developed land wherever possible and contribute to resource conservation and reducing climate change emissions, following the sequential approach. Friends of the Earth therefore recommends that the RSS contains robust information on the current state of employment designations across the region.

6.8 Friends of the Earth recommends that RSS requires development plans to include phasing policies 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.

6.9 Friends of the Earth recognises that more proactive fiscal measures are needed to help local authorities and regeneration agencies to facilitate the redevelopment of brownfield land, especially where there is a history of contamination on sites. Friends of the Earth recognises the importance of funding mechanisms and urges the RDAs to call for more money to be made available for this purpose. It has to be acknowledged that land use planning alone cannot bring about the much needed regeneration in this area but it is crucial that development plans are used as positive planning tools. As such, they should steadfastly restrict development on greenfield sites whilst facilitating it on previously developed land. Only through such mechanisms will development be channelled in the right directions. Friends of the Earth therefore recommends:

6.10 Provision should be made 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;**
- **the need to reduce the need to travel by car and reduce road freight movements**
- **the need to remote inclusive mixed used communities**
- **their contribution to areas in need of regeneration and other areas of high unemployment;**
- **need to enhance and protect bio diversity**
- **The need to protect local landscape and heritage features.**

Business Planning Zones

6.11 Friends of the Earth strongly opposes the designation of Business Planning Zones enabled by section (45) of the PCP Act 2004. Simplified Planning Zones already exist and have not proved popular or effective. (There is a considerable weight of research which highlights the shortcomings of the of the SPZ model, in particular Blackhall 1994 and Allmendinger 1996). We are concerned at the scale of these sites and the removal of democratic accountability and rights of scrutiny over industrial developments inside these zones. The designation of these zones may also remove the ability of a local authority to control important issues such as car parking standards and other policy requirements which contribute to sustainable development. Enough scope already exists inside the planning system to designate sites for industrial and commercial development inside the plan led system. It is important to note that there is little evidence that planning control is a major factor in deterring inward investment. The limited success which some claim for Enterprise Zones was largely the result of fiscal incentives and not planning de-regulation.

Retail Development

6.12 Friends of the Earth considers that the sequential approach defined in PPS 6 which favours town centre development over out-of-town retail development is a vital component of a sustainable retail strategy. Out-of-town development has had a lasting and detrimental impact on the social and economic fabric of existing communities. The most stringent assessment is necessary of any new proposals which further undermine existing retail centres. Friends of the Earth welcomes the recent statement of the Deputy Prime Minister that out-of-town development should only be allowed when a quantitative need can be demonstrated. We also welcome the clarification given by the Deputy Prime Minister that 'regenerative need' (Parliamentary Statement on Town Centre Planning Policies, John Prescott, 10 April 2003) should not be used to support out-of-town supermarkets. Assuming that 'regenerative needs' are related to social and economic aims, we would argue that both are better met by local shops than out-of-town or even edge-of-town large-format supermarkets. Certainly the Social Exclusion Unit notes that out-of-town retail development has disadvantaged people without access to a car and raises concerns about the loss of local food shops. There is also evidence that independent local

stores keep money circulating within the local economy and therefore bring more economic regenerative benefits to the local area. Unfortunately we are currently losing about eight independent shops every day.

- 6.13 There are clearly sound arguments for retaining and strengthening existing policy to restrict out-of-town development but there is also a clear logic in extending restrictive policy to any form of development which undermines existing retail centres. As PPG 6/PPS 6 has successfully restrained out-of-town development, the multiple retailers have found other ways of expanding, including the return to the high street in the form of 'metro' or 'local' formats. We are concerned that rather than reinvigorating the high street this has instead caused new problems for smaller businesses who find it difficult to compete with the multiplexes. The biggest supermarkets have the ability to enter into aggressive price wars on a limited range of items without damaging their profitability. Small or medium sized retail businesses cannot compete against this. The loss of independent shops is decreasing diversity in the high street, and once competition is driven out the multiplexes can raise prices once again, disadvantaging those on low incomes.
- 6.14 As result Friends of the Earth recommends the adoption of a retail floor space threshold to restrict the development of large scale retail outlets that would damage existing retail centres. Friends of the Earth is persuaded that the approach adopted by a number of European nations and English RPG documents of a retail floor space cap or threshold has significant merits. We note that the Draft PPS 6 supports the principle of planning authorities adopting retail thresholds in certain circumstances. (PPS 6, ODPM, 2004) As result Friends of the Earth recommends that in addition to the sequential approach the following policy be incorporated into the RSS:
- 6.15 In future, all development plans should incorporate clear policies and proposals for retail development, including a cap of 3,000 m² of net retail floor space in retail outlets. 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 safe guards contained within 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 paragraph 1.5 of this briefing.**
- 6.16 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.

- 6.17 In cases where the applicant already has a significant market share in the local area the local authority should inform the Office of Fair Trading of the application in order that the implications for local competition can be assessed and an investigation can be carried out by the competition authorities where necessary.

Promoting diversity and vitality in existing retail centres

- 6.18 The RSS should play a positive role in promoting vibrant, diversified and localised retail development in the region. This requires a new approach to understanding the needs of small and medium sized retailers and combating the continued loss of such businesses.
- 6.19 In order to do this, it is not sufficient to rely simply on the increased restriction of new out-of-centre developments but is also necessary to increase the attractiveness of existing centres to shoppers and other visitors, as well as to retailers and developers. The strengths of existing shopping centres are that they include a wide range of service and leisure facilities as well as shops, and are generally the focus of public transport services. Their weaknesses are that they are often perceived to be inconvenient, cluttered, dirty, poorly designed, traffic congested, unsafe and not to be adapting to the changing needs of shoppers and retailers. Further perceptions are of a lack of pedestrian facilities and weather protection. In order for town centres to achieve their full potential and continually improve as retail destinations it will be appropriate and necessary for planning authorities to adopt a pro-active approach in enhancing the vitality and viability of their centre(s).
- 6.20 Retail planning policy should therefore reinforce investment in urban renewal by seeking to support 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. Friends of the Earth recognises that planning policy is not the only way in which the regional agencies can or should support local shops but we believe that planning policy can and should help to deliver on the Government's objectives on improving access to healthy and affordable food. RSS provides an ideal opportunity to explicitly connect retail planning policy with social exclusion policies.

Promoting retail diversity and vitality in new developments

- 6.21 The principles of PPS 6 and the policy proposals set out above for existing retail centres should also apply to new developments. This will be particularly important in areas of major housing expansion such as Thames Gateway and Milton Keynes. These growth areas provide an opportunity to put into practice the principles of sustainable development and to demonstrate the benefits of a pro-active approach to encouraging vibrant district and local centres. In creating large areas of new housing, access to local shopping facilities must be provided in order to avoid increased reliance on car use. Reliance on existing facilities, rather than provision of new local facilities, would also encourage more travel from the extended area. The proposed

growth areas include provision for affordable housing so it follows that adequate access to a range of retail outlets must be provided for those without access to a car. Access to corner shops and neighbourhood retail centres should therefore be a vital part of the master plan of any major housing development. If this does not happen, social exclusion will be built into the growth areas from the outset.

- 6.22 There is a danger that dependence on private injection of finance into major schemes may encourage the proliferation of the biggest retailers in the form of large 'one stop shop' formats, at the expense of a more diverse and more local retail provision. There is a trend for major grocery retailers to move into non-food goods so that it would be attractive to companies such as Wal-Mart to develop 'superstores' in growth areas selling everything from food to televisions and clothes. However it is vital that contributions from major retailers to infrastructure, housing, sports or other facilities should not override the principles of PPS 6 or the need to create long term sustainable and socially just communities.
- 6.23 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

- 6.24 Friends of the Earth believes that planning policy has a key role to play in delivering on the Government's policies on sustainable rural economies. The specific role of retail planning guidance should be to encourage innovative forms of retailing, such as farmers markets and high street shops selling local farm produce. The Government's Strategy for Sustainable Farming and Food recognises the importance of local food initiatives, noting that they "not only benefit producers, but help bring life to town centres and connect consumers with the rural economy" (2002, DEFRA). Friends of the Earth would therefore expect RSS to encourage local authorities to take a favourable and proactive approach to local food retailing. Friends of the Earth therefore recommends the following policy:
- 6.25 Local authorities should develop policies which provide a presumption in favour of retail developments which make a primary contribution to sustaining local food producers, including specific guidance in Supplementary Planning Guidance.**
- 6.26 Planning policies should also be supportive of local facilities in small towns and villages which provide an effective and valuable service to the local community. Development plan policy should recognise the vital economic and social role of the village shop in rural areas and its importance for essential day-to-day needs, particularly for the elderly, disabled and those with no access to a car or those who are poorly served by public transport.

- 6.27 In summary we consider that in order to encourage a more diverse, equitable and sustainable pattern of retailing, RSS must strengthen existing policy to restrict out-of-town retail development and must also take a much more proactive stance on encouraging local shops and local food initiatives.

7. Housing

The Governments Housing Policy

- 7.1 Friends of the Earth wishes to see a step change in housing provision to ensure that it is based on the principles of sustainable development and in particular meets social housing need while respecting environmental limits and reducing climate change emissions. Existing policy has led to the development of large scale greenfield sites with an undoubted impact on the environment. The development of these sites has often been unimaginative, low-density and largely dependent on the car. The provision of new housing in suburban locations has contributed to the decline of the inner areas of our towns and cities. Existing housing policy has dramatically failed to deliver equity in the provision of housing. Many of the most vulnerable groups in society, particularly the young and the elderly, live in unacceptably poor housing conditions. The provision of large-scale new housing development would do nothing to meet these needs nor would it address the critical issue of affordability. Current housing policy tends to reinforce the tension between the national need to provide new homes and the rights of individuals and communities to have a say over the way that their areas develop. New policy must make clear where the boundaries between these sometimes contradictory policy objectives lie in order to avoid divisive political polarisation. Traditional forecasting techniques based on crude trend projection have proven inaccurate and insensitive to local needs. Forecasting for housing must be sensitive to local housing needs surveys and to the environmental and social capacity of a locality to take increased housing numbers.
- 7.2 Friends of the Earth has a range of concerns over recent Government housing policy contained within ODPM's five year action plan and ODPM's consultation paper Planning for Housing Provision, July 2005, and in the PPS 3 consultation draft. These documents seek to implement the contents of the Barker report. The Barker Report is a profound barrier to the implementation of sustainable development. Further details of Friends of the Earth's concerns, as expressed in our consultation response to PPS3, our briefing on implementing the Barker Report, and within our evidence to the Environmental Audit Committee, can be found on our resources pages at www.YourPlanningRights.co.uk.

Making Good policy

- 7.3 The consideration of housing policy should be conducted holistically, considering the full range of factors which define quality, quantity and accessibility. These factors include:
- Population and household formation rates
 - Housing conditions
 - Empty and second homes
 - Affordability

- Tenure choice

The current debate over housing is dominated by housing land supply and underplays the need to address affordability and housing quality.

- 7.4 Friends of the Earth accepts that housing poverty reflected through homelessness and poor conditions is a major contributor to social exclusion. The level of poor housing conditions for children and the elderly are of particular concern. We also recognise that demographics and particularly the growth in household formation has created a demand for new homes and new kinds of homes. We do not accept however that predict and provide in relation to new-build provides an effective or sustainable solution to these problems. We also strongly reject the assumption that increased housing provision will tackle house-price inflation. In order to achieve a lowering of house prices through market mechanisms it will be necessary to generate an oversupply of housing, which would breach the principles of sustainable development.

Friends of the Earth's Principles for housing provision

- 7.5 New housing policy should 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 the promotion of 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.**

Regional redistribution

- 7.6 Friends of the Earth supports the need for a National Spatial Framework for the UK which can provide the strategic context for sustainable housing provision. This framework should have the prime objective of redistributing demand pressures from areas of growth in the South-East to areas of low demand in the North and West. Such a policy should also address the need to deal with the drivers of housing demand by restricting and decentralising public and private sector commercial growth

from South to North. This policy should achieve a fairer more balanced distribution of population and industry to achieve:

- **The social, economic and environmental regeneration of areas of low demand to ensure increased life chances and social well being.**
- **To prevent the continued breach of core environmental limits (such as biodiversity and water resources) in areas of high demand and continued decline of quality of life.**

7.7 The recent publication of census data reinforces the relative decline of regions such as the North East and North West while areas such as Milton Keynes have seen growth of around 60% in the last 20 years. Government must address the need to deal with the vacuum in policy left after the abandonment of comprehensive regional redistribution policies in the early 1980s. The practical result of this approach to housing is that policy should no longer attempt to meet general demand in all regions. While social housing needs must be delivered everywhere, the continued expansion of housing in the South East is not sustainable in the medium and longer term.

Housing Land Provision

7.8 Friends of the Earth strongly supports the use of a sequential approach to the provision of housing land, which is encouraged through PPG 3 and 13 and defined in paragraph 2.2 of this document. Friends of the Earth emphasises the need for this RSS to reflect a 'plan, monitor and manage' approach to housing provision. This suggests that a flexible and iterative approach is required, with an emphasis on meeting local needs and formulating creative solutions to protracted problems through continual monitoring and adjustment. The housing aims of this RSS should reflect such an approach from the outset.

Setting targets for the recycling of land and buildings

7.9 Friends of the Earth strongly supports the aim of increasing the percentage of housing development which takes place on previously developed land and the conversion of redundant buildings. This helps development to occur within the environmental limits of a region and can play a positive role in urban regeneration. Friends of the Earth believes that a greater level of 'recycling' of land and buildings could occur if policies and programmes were in place to support it. Thus, it is essential that policies to guide such an increase are clearly set out in RSS and that funding regimes are put in place to support these policies. These should aim for at least 75% of all housing provision to be made on previously used land. Friends of the Earth recommends the following housing policy:

7.10 Local authorities should include policies in their Development Plans which will lead to an increase in the level of housing development on previously developed land so that the target of 75% can be reached over the plan period. These policies 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.**

A phasing mechanism

7.11 Friends of the Earth strongly supports the use of phasing mechanisms to ensure that housing developments take place on previously developed land before the use of greenfield sites. Phasing mechanisms should have three components:

- i. Policies need to ensure that land allocated in Development Plans is brought forward at a rate which encourages the reuse of urban land.
- ii. Local authorities must be proactive to bring forward previously developed land.
- iii. Policies should reflect paragraph 30 and 31 of PPG 3 which places an emphasis on: using previously developed sites within urban areas; converting existing dwellings and non-residential premises; raising densities; releasing land held for alternative uses; and facilitating area wide redevelopment through land assembly measures.

RSS should emphasise the priority to achieve the most efficient use of land by adopting this sequential approach to ensure maximum use of previously developed land.

Design and density

7.12 Fundamental to the attainment of achieving urban and rural renaissance is improving the attractiveness and safety of cities, towns and villages and, where new development takes place, the creation of high quality, sustainable places where people chose to live, work and take their leisure. Friends of the Earth is particularly concerned to emphasise the need for increased densities to be encouraged and for more resource efficient homes to be built in the region. To this end, Friends of the Earth recommends that minimum acceptable density levels are included as a guide in the RSS. PPG 3 states that low density of development should be avoided and emphasises that densities of up to 50 dwellings per hectare may be appropriate if close to existing centres. Circular 01/05: The Town & Country Planning (residential density) direction 2005 reinforces the Government's view that development of less than 30 dwellings per hectare should be avoided and creates a specific power in the South East to review such applications. 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. Friends of the Earth supports measures which can help to make more effective use of existing urban areas but would wish to emphasise that infill development should not take place at the expense of the quality of the urban spaces.

Low Impact Housing

- 7.13 RSS 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. Such development has a minimal or benign affect on the local and global environment and provides a visionary model for how sustainable communities might develop in the future. RSS should provide strong leadership in encouraging such housing design. Detailed policy recommendations on low impact housing are dealt with in Chapter 4 which deals with Climate change.

Affordable housing

- 7.14 Housing equity is a vital part of the sustainable development of the region. There is 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.
- 7.15 The RSS 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.

Monitoring housing supply objectives

- 7.16 Core indicators for monitoring housing supply are a vital part of effective implementation of housing policy. Friends of the Earth would recommend that the core indicators to be used are:
- **affordable housing provision as a proportion of all housing completions (as stated)**
 - **the number and proportion of new dwellings including conversions built on previously developed land, which should be above the aspirational targets set out in the RSS**
 - **the average density of new development, which should normally be above 30 dwellings per hectare**
 - **the number of households in substandard or overcrowded accommodation.**

8. Waste management and resource use

8.1 The English regions have an increasingly important role to play in waste and resource management. Planning for waste at the regional level is a new chance to ensure that waste management in England is both strategic and sustainable. Waste management must meet the new and stringent requirements to deliver sustainable development contained in PPS1, PPS 10 and the UK Sustainable Development Strategy. Friends of the Earth wants to see waste planning moving away from the 'predict and provide' approach to reflect a true resource management approach and aim towards zero waste production. Specifically Friends of the Earth would like to see the following policies included in Regional Spatial Strategies.

Principles

8.2 The RSS will set out the following principles by which the policies and proposals contained in local waste plans will promote sustainable waste management:

- The waste hierarchy
- The proximity principle
- Social and economic costs and benefits of waste management
- Cumulative impacts of waste facilities on the wellbeing of the community.

8.3 The RSS will therefore need to adopt the following policies to support these principles:

- **Local authorities and the RDA will encourage innovative policies, practices and technologies to deliver sustainable waste management – which has the waste hierarchy at its core**
- **Waste Planning Authorities shall plan for waste to be managed close to its place of production. The location of waste management facilities should take account of the origin of the waste arising, aiming to minimise the distance travelled.**

Assessing strategic waste management options

8.4 The removal of BPEO as the principle methodology in the assessment of strategic waste management policy means that SEA is now the key process for reaching informed judgments on development options. SEA requires detailed understanding of environmental impacts and detailed consideration of national and international policy and treaty obligations particularly on climate change. Given the controversy over waste disposal it is vital that the SEA process is robust and fully participative. Regional Planning Bodies will need to collect comprehensive base line data on the potential impacts of disposal options and present this data in a transparent way. Issues of health and well being should be fully integrated in the process from the beginning.

Waste prevention

- 8.5 Friends of the Earth believes that waste prevention is the first critical step in sustainable waste management. However, it has received much less attention at national level than options further down the waste hierarchy such as recycling and landfill. Friends of the Earth is calling on the Government to set a national waste prevention target, followed by targets for individual local authorities. Regional assemblies have a role to play in providing support for local authority waste prevention and exploring how economic incentives applied at the regional level could prevent waste from being created by both households and businesses.
- 8.6 The RSS will support the progressive reduction of waste that requires disposal, leading to the region becoming a zero-waste region. To this end, the RSS will:
- **Adopt a target to achieve zero growth of all waste by 2010 and reduce total waste volumes by a further 5 per cent from this level by 2020**
 - **Ensure a waste reduction target is adopted in the Regional Spatial Strategy and the waste development plans drawn up by Waste Planning Authorities**
 - **Identify and disseminate examples of good practice encouraging public sector organisations, businesses and households to reduce waste**
 - **Through the Regional Waste Strategy, identify action that Regional Development Agencies can take to promote resource efficiency and waste minimisation by businesses.**

Recycling and composting

- 8.7 The RSS should require that the assembly will adopt the following policies that promote the recycling and composting of all waste streams in order to drive waste management up the hierarchy.
- **Local authorities, businesses and other stakeholders should give priority to initiatives and facilities which will encourage and promote waste reduction and the reuse of materials and products, thereby addressing waste as a resource and driving waste management up the hierarchy**
 - **Regional assemblies will take steps to ensure that data on commercial and industrial, construction and demolition waste arisings and recycling rates are collected and shared throughout the region.**
- 8.8 For municipal waste:
- **The assembly will achieve a regional recycling rate of at least 50 per cent by 2010 and 75 per cent by 2015**
 - **Local authorities should achieve a minimum target of 50 per cent for the recycling and composting of municipal solid waste by 2010**

- **Local authorities should not enter into any waste management contract that would lock them into a requirement to deliver municipal waste to landfill or energy from waste where the best environmental route for that waste is to reuse, recycle or compost it**
- **Local authorities should ensure that no recyclable or compostable waste is disposed of to landfill by 2020.**

Residual waste

- 8.9 Friends of the Earth considers “residual waste” to be the limited amount of waste that remains after an intensive waste reduction, reuse and recycling programme. This still requires treating and the quantity of this waste will reduce over time, therefore ruling out large and inflexible technologies such as incineration.
- 8.10 In planning for residual waste management, waste planning authorities should ensure that:
- Firstly, any remaining recyclable waste should be removed (e.g. metals, plastics, some paper).
 - Secondly the small amount of waste remaining after this should be composted or anaerobically digested and, unless sufficiently clean to be used as compost, should be disposed of to landfill (as the disposal route with lowest environmental impacts for this waste).
 - These processes should occur in small, localised treatment plants.

Climate Change

- 8.11 Waste disposal contributes towards climate change, for example through the release of methane from landfill sites or the burning of fossil fuel based plastics. Research suggests that untreated waste going to landfill and incineration are the worst options for climate change (Community Recycling Network, ‘Maximising Recycling Rates, Tackling Residuals’, 2002). Furthermore, recycling brings more energy savings than energy from waste options because destroying materials through burning them means that more energy needs to be used overall to extract and process raw materials into the goods we buy and use (Friends of the Earth, ‘Greenhouse Gases and Waste Management Options’, 2000).
- 8.12 The assembly will ensure that regional and local waste management plans and policies address the causes and potential impacts of climate change, through the following policies:
- **The assembly will take climate change impacts into account when determining the ‘pattern of facilities’ for waste management by considering, alongside other environmental impacts, the net greenhouse gas emissions across the resource and waste life-cycle for each form of waste management**

- **Waste planning authorities will take climate change impacts into account when planning for sustainable waste management and determining planning applications.**

Use of natural resources

- 8.13 The assembly will ensure that regional and local waste management plans and policies make more efficient use or reuse of existing resources, through the following:
- **Waste planning authorities will minimise the need to consume new resources by planning for the capture of maximum material value from the waste streams generated locally, before planning for the capture of energy value from waste**
 - **Local authorities are encouraged to set up ‘closed loop’ recycling systems. For example, where waste paper generated by local businesses is recycled into office paper that is then re-used by those businesses; or where household garden and kitchen waste is composted and sold back for use in the garden**
 - **Waste planning authorities will take account of the resource benefits of composting in terms of its creation of humus in soil.**

Allocation of waste tonnages

- 8.14 The assembly should ensure that in allocating tonnages of waste to Waste Planning Authorities, businesses are fully supported to reduce, reuse and recycle commercial, industrial and construction waste that is not the responsibility of local authorities.

Location of waste facilities and community well-being

- 8.15 Friends of the Earth is particularly concerned about the impacts of landfill and incineration on human health and well-being. While these impacts are partially controlled through legislation outside the planning process, we note the provisions of Planning Policy Statement 23 and the general requirement of the planning process to protect the ‘amenity’ of local communities. Public concern about development proposals are a material consideration in planning. The Inspector in the Kidderminster Incinerator Inquiry concluded that the public perception of risk was a negative factor of some significance in that case. The Lancet published a scientific paper in 1998 which shows that mothers living within 3 km of a hazardous waste landfill site are one third more likely to have babies with birth defects (Toxic Tips, Friends of the Earth Briefing 1999).
- 8.16 Incinerators also pose a health risk and it is impossible to say that incinerators are “safe”. Incinerators release dioxins and as much of the UK’s population are already exposed to unacceptable levels of dioxins it is questionable whether any new sources should be allowed until there have been considerable reductions in the dose that the population is already receiving (Incineration and Health Issues, Friends of the Earth briefing 2002). In this regard, proposals for waste disposal (landfill and incineration) operations should be subject to the precautionary principle, particularly when they are in close proximity to human habitation.

8.17 The assembly should therefore adopt policies which ensure that:

- **The cumulative impacts of waste facilities do not adversely affect human health, well-being or the ‘amenity’ of local communities, either immediately or over time**
- **Landfill sites should not be permitted within 2 km of human habitation or that have a negative environmental impact on watercourses or aquifers.**

Waste and renewable energy

8.18 Friends of the Earth believes that in the future, certain source-separated portions of the biodegradable fraction of municipal waste (e.g. woody wastes) may be used to generate heat and electricity in suitably sized biomass generators, where it can be demonstrated that recycling or composting are not better options in environmental terms. The recycling and composting targets recommended here (see paragraph 10.4) are not intended to preclude local or regional authorities from pursuing such a strategy.

Development design

8.19 New building design and layout can contribute to effective waste management. Specific provision should be made for space to allow for the separation and collection of waste, whether it be a housing development, employment, retail, leisure or mixed use. The Strategy Unit’s report ‘Waste not, want not’ recommended that building regulations should be revised to require space for recycling facilities in new developments. The assembly should therefore adopt policies which ensure that:

- **Development plans should require that all developers provide appropriate space to facilitate storage, re-use, recycling and composting of waste**
- **During the construction of developments, recycled construction and demolition wastes should be used and the waste produced should be minimised**
- **Development plans should require the use of recycled construction and demolition waste in construction projects**
- **Reference to the Z-squared standard (see box 4, page 24).**

Hazardous waste

8.20 The assembly will need to consider how to manage any hazardous waste that arises from the region. They should therefore adopt the following policy:

- **Waste Planning Authorities will undertake an analysis of the composition of hazardous waste arising within the region, and link their management to the provision of waste transfer and treatment facilities whose emphasis will be on reuse, recycling and biodegradation; and, where the need for disposal is essential, this should only occur by means of a dedicated hazardous waste facility.**

9. Natural resources

- 9.1 The Regional Spatial Strategy has a critical role in safeguarding the natural environment and promoting biodiversity. The RCEP Report, 'Environmental Planning' 2002, made clear the importance of the natural environment in achieving sustainable development.
- 9.2 “The natural environment offers critical resources and services, which can seldom be substituted by, or traded for, economic or social products of civilisation. It is our home, and the living world in all its diversity is of fundamental importance to our dignity as humans. These intrinsic aspects of nature may be termed unique values. Together with the critical values of the natural environment they constitute a heritage that a sustainable society must be able to hand on to future generations”. (EEAC 2001, cited in the 23rd report of the Royal Commission on Environmental Pollution, Environmental Planning, HMSO 2002)
- 9.3 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. RSS should provide a framework for both protecting and enhancing biodiversity and ensuring resource conservation.

Promoting Biodiversity

- 9.4 The United Kingdom has signed the Biodiversity Convention, which requires that the components of the Earth's biological diversity should be used in ways which do not lead to their decline. The commitments contained in the convention should be reflected by the region's priorities and programmes. The Countryside and Rights of Way Act 2000 also places duties to promote the conservation, enhancement and restoration of those species and habitat types identified as priorities for biological conservation. 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.
- 9.5 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 and reflected in both development plans and development control decision-making. Both RSS and LDFs have critical role in assisting species response to climate change by protecting and enhancing key

habitats and in particular linked habitat networks. As a result, Friends of the Earth recommends the following policy to be incorporated into RSS:

Biodiversity

9.6 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. RSS and LDF should prioritise the creation of habitat networks.

9.7 Management of habitat and landscapes should:

- **Prioritise the creation of habitat networks that assist species response to climate change.**
- **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.**

Resource conservation

9.8 Resource conservation is a vital objective of the RSS if the region's environmental limits are to be upheld. Resource conservation should be embedded in all the policy objectives of the RSS and this document contains specific guidance in relation to:

- Renewable Energy (see chapter 6)
- Climate change (see chapter 5)
- Waste (see chapter 10)
- Housing design (see chapter 7)
- Transport (see chapter 8)
- Minerals (see chapter 11)

9.9 In addition, Friends of the Earth is particularly concerned at the depletion of regions' soil and water resources. RSS policy should:

- **Conserve good agricultural land (50% of Grade 1 land in the UK is below the 5 metre contour, much of which is threatened with flooding or salination).**
- **Promote agricultural de-intensification.**
- **Re-establish wildlife habitats on floodplains (which helps to reduce flooding and mitigate climate change).**
- **Avoid development where there is flood risk.**
- **Maximise biodiversity in flood plains.**
- **Protect water quality and avoid developments which might pollute water courses or groundwater.**
- **Require new developments to have sustainable drainage systems, and systems for water re-use where appropriate.**
- **Reduce water abstraction to sustainable levels.**
- **Locate and phase development to take account of constraints on water resources.**

Annex 1: Airport expansion – a serious threat to regional climate policies

Spatial planning can make a major and positive contribution to meeting the challenge of climate change by adopting policies to reduce emissions of greenhouse gases (GHG) and supporting measures to adapt to the consequences of climate change. The Regional Spatial Strategy (RSS) is the most powerful of these planning tools. Friends of the Earth argues that the policies in the RSS must promote the reduction of greenhouse gas emissions in line with Government policy.

But the 2004 Planning Act says that RSS must be in conformity with the policies of the Government's 2003 Aviation White Paper (AWP)^{xvii} on airport development^{xviii}. The rapid and large scale expansion of aviation across Britain proposed in the AWP is in direct conflict with other Government policies on reducing greenhouse gas emissions that cause climate change.

This analysis draws on the findings of two recent reports by the respected and independent Tyndall Centre for Climate Change Research. These reports show that all householders, motorists and businesses will have to reduce their carbon dioxide pollution to zero if the growing aviation industry is to be incorporated into Government climate change targets for 2050. It is clear that aviation expansion of the magnitude proposed in the AWP will have profound consequences for other sectors of the UK economy.

This presents regional planners and decision makers with the impossible task of meeting their obligations to tackle climate change while allowing airport expansion to proceed on the scale proposed by the Government in its Aviation White Paper.

Aviation emissions

Aviation is the fastest growing source of climate changing emissions both internationally and in the UK. Emissions from aircraft are especially potent because of complex chemical reactions that take place at altitude. The InterGovernmental Panel on Climate Change (IPCC) estimates that this gives them 2.7 times more global warming impact than carbon dioxide alone^{xix}.

Greenhouse gas (GHG) emissions from international flights are not part of the Kyoto protocol, the key international agreement to reduce GHG emissions around the world. Domestic flights are included, but they form a relatively minor component of the UK's aviation emissions with international flights responsible for 97% of UK aviation emissions^{xx}

Although there is currently no agreement on who is responsible for emissions from international flights, the UK Government accepts the principle that the UK should be responsible for 50% of these, and they are included in official CO₂ emissions statistics. Environment Minister Elliot Morley was recently quoted as saying "it is ludicrous that aviation is completely outside any of the international agreements and other measures relating to emissions control, and it can't go on"^{xxi}. We believe that in due course it is therefore

inevitable that the regions will become responsible for at least 50% of international aviation emissions.

Regional planning and the Aviation White Paper

The AWP plans a virtual 3-fold increase in air passengers by 2030 with a doubling of CO2 emissions as a result. It supports the provision of 4 new runways and other new airport infrastructure to accommodate this projected growth.

The Government claims that expansion of aviation is essential as a major source of economic growth. Naturally, aviation creates jobs like any economic activity but the rapid growth of low cost leisure flights is literally flying money out of regional economies^{xxii} and isn't necessarily providing more jobs^{xxiii}. The passenger growth predictions in the AWP are based upon the assumptions that air fares will fall by 1% per year and that the price of oil will remain constant at \$25 per barrel – a highly questionable assumption^{xxiv}.

In order to force support for this growth agenda, the 2004 Planning Act says that Regional Spatial Strategies (RSSs) must be in conformity with the policies of the AWP on airport development. Crucially and unhelpfully, it does not detail how regions can support aviation expansion, growth in populations, jobs and housing and reduce GHG emissions to meet climate change targets at the same time.

There is growing concern in England's regions about the consequences of aviation expansion. The East of England Regional Assembly (EERA) in the draft East of England Plan, has withheld its support for a new second runway at Stansted although it is accepting the increase of passengers up to 40 million passengers per annum (mppa), the theoretical limit of the existing single runway, from the current ceiling of 25 mppa. The unsustainable nature of the proposed increases for the East of England region is made clear in the accompanying Sustainability Appraisal/Strategic Environmental Assessment of the Plan, it says:

“..The environmental caveats and conditions, and limitation to existing runway capacity at Luton and Stansted are welcome. But the acceptance of growth at all, and the reference to an ‘acceptable balance’ between economic benefits and environmental and other considerations, still fails to grasp the point that further growth in air travel provision is environmentally unsustainable”(our emphasis) ^{xxv}

In a separate report the South East England Regional Assembly (SEERA) said of the AWP that:

“..its assumption of very substantial increases in air traffic over the Plan period is inherently unsustainable and conflicts with other aspects of Government policy;”^{xxvi}

The Tyndall Reports

The growing concern of England's Regional Assemblies over aviation expansion has recently been given further credence with the publication of two reports by the renowned Tyndall Centre for Climate Change Research, one of the world's leading independent

climate research bodies. The first report, 'Growth scenarios for EU and UK aviation – contradictions with climate policy' (June 2005)^{xxvii} looked at aviation expansion in the context of EU and UK climate policy and also other UK sectors.

The Tyndall Centre investigated aviation growth trends and calculated that emissions from the sector will rise rapidly between now and 2050, assuming these trends continue. It took account of the way in which air transport markets mature and assumed that significant improvements in fuel efficiencies would be achieved. It also assumed that each country would take responsibility for 50 per cent of the emissions from international flights to and from its airports. The report then compared this emissions growth with the profiles of declining total emissions under a contraction and convergence climate policy – a policy increasingly recommended for avoiding the worst impacts of climate change. "Under contraction and convergence, all nations work together to achieve collectively an annual contraction in emissions. Furthermore, nations converge over time towards equal per-capita allocation of emissions."^{xxviii}

Tyndall concluded that if aviation growth continues at the rate proposed, it could take up the entire emissions allowance for all sectors of the UK economy by 2037, based on an atmospheric stabilisation target of 450 parts per million by volume (ppmV) and assuming a radiative forcing multiplier (uplift factor - see 'Aviation emissions' above) of 2.7 is used. The atmospheric stabilisation target is the concentration of CO₂ in the atmosphere at which the world's leading climate scientists believe catastrophic climate change will be avoided. The UK Government target for CO₂ emission reductions is designed to not exceed 550 ppmV, but climate scientists now believe the target should be 450 ppmV. This would mean that after 2037 only aircraft would be allowed to emit CO₂.

Moreover, between 2010 and 2020 (which covers the time spans of the RSSs being drawn up in England's regions), UK aviation emissions could already be equivalent to the entire 2050 target. This growth could only be allowed at the expense of other sectors which would have to cut their emissions far more severely than they otherwise would.

Tyndall states:

"This report demonstrates severe consequences for...the UK ...in terms of meeting their obligations to reduce carbon dioxide emissions under a contraction and convergence regime, if European Governments continue to permit, or indeed promote, historically high levels of aviation growth."

Friends of the Earth concludes that forecast aviation growth will make it virtually impossible for the Government to meet its 60 per cent CO₂ reduction by 2050 target. Therefore, the Government must withdraw its Aviation White Paper and introduce economic measures and sector targets to achieve stabilisation of CO₂ at 450ppm by 2050.

Tyndall's second and more recent work 'Decarbonising the UK – Energy for a Climate Conscious Future' (Sept, 2005)^{xxix} looked in more detail at the ability of all UK sectors to reduce their carbon emissions. It concluded that all other sectors would have to become carbon neutral, i.e. emit no CO₂, in order to accommodate the expanding aviation sector within climate targets.

Tyndall commented: "An unequivocal and dominating conclusion in relation to carbon

emissions is that growth in aviation must be dramatically curtailed from both its current level and historic trend”.

Where does this leave regional decision makers?

Clearly it is not possible to accommodate aviation growth on the scale projected and take the necessary action to tackle climate change.

Right now, decision makers in England’s regions are left with a fundamental conflict between the demands of the Government’s Aviation White Paper and the requirement to urgently tackle climate change laid down in Planning Policy Statement 1 (PPS1), “by addressing the causes.. . of climate change”.

So which should take precedence?

- The demands of the current Government to design regional strategies that include new airport infrastructure to accommodate projected growth mainly in leisure flights, with questionable economic benefits,
- or**
- The necessity to act quickly and decisively and develop regional strategies that address the challenge of tackling climate change?

A way forward – recommendations

Regional bodies and leaders now have a critical role here. Friends of the Earth recommends that they must:-

Resist the incorporation of plans for new airport infrastructure in their RSS on the grounds that to do so conflicts with the urgent necessity to address the causes of climate change and will unfairly impact upon all other sectors of regional economies, including households and small businesses, and

Use every available opportunity to point out to central Government the total incompatibility of the conflicting demands that they face.

Annex 2: Strategic Minerals Policy

Coal

Friends of the Earth believes that RSS should fully reflect the provisions of MPG 3 and particularly the stringent policy test for opencast coal represented in paragraph 8 of that document which introduces a qualified “presumption against such development” (MPG 3 DETR 1999). This policy test creates an explicit presumption against opencast coal extraction unless community benefits can be seen to clearly outweigh the environmental impacts. MPG 3 creates further and more stringent tests for developments in green belt. The regional guidance document must fairly reflect this guidance and the following policy amendment is recommended:

Development plans should reflect the presumption against opencast coal development contained within MPG 3.

Aggregates provision

Friends of the Earth recognises the importance of an adequate supply of aggregates to ensure the sustainable development of the region. However, in the past the production and transportation of aggregates has produced unacceptable environmental outcomes particularly in relation to the impact on designated sites of nature conservation value, areas of outstanding natural beauty and national parks. Aggregates production must be managed inside the principles of sustainable development set out in paragraph 1.4. This requires a careful reconsideration of the principles behind aggregate forecasting and in particular a move away from the simplistic predict and provide for primary aggregates. Instead the production of aggregates must be closely related to a detailed consideration of the environmental capacity and environmental limits of the region. Careful consideration must also be given to aspirational targets for the use of recycled materials and secondary aggregates.

Friends of the Earth believes that the process of forecasting aggregates through the Regional Aggregates Working Parties and the implementation of minerals policy should be based on the following principles:

- The forecast aggregates production must be set within the environmental limits of the region. Aggregates forecasting must be based on a careful consideration of the environmental carrying capacity of the region's ecosystems and its ability to support aggregates production without irreversible damage. This approach implies the end of the crude notion of predict and provide and a move to a ‘plan, monitor and manage’ approach.
- No new quarry permissions should be granted in areas with significant land banks of permitted reserves.
- RSS should promote clear targets for recycled aggregates.
- Nationally and internationally designated areas and features should be afforded the

highest degree of protection so that there is a presumption against any minerals development which may have a negative environmental impact.

- To encourage a democratisation of the aggregates planning process in order to reflect the concerns of local communities at the wide ranging impacts of mineral extraction developments in close proximity of human habitation.

Policy should also acknowledge the cumulative impact of mineral working in particular areas of the region. The notion of cumulative impact relates both to the historic and concurrent levels of development as well as the multiple environmental impacts which arise from individual mineral extraction operations. The following policy is therefore recommended:

In considering all new minerals developments and in the review of dormant permissions, mineral planning authorities should apply the principles of sustainable development. There will be a presumption against any development which will have a detrimental impact on nationally and internationally designated nature conservation areas. Mineral developments must meet stringent environmental conditions in order to safeguard human well-being and be subject to health impact assessments as part of the EIA process.

Annex 3: Sustainable rural development

Rural areas have been subject to a range of environmental, social and economic pressures in recent years which have left many communities facing an uncertain future. These pressures include:

- Critical loss of biodiversity as result of the intensification of farming techniques;
- declining agricultural employment arising from falling world prices for basic agricultural products following globalisation and greater efficiencies in the farming industry;
- counter-urbanisation leading to population growth and a gradual extension of urban values and lifestyle aspirations, resulting in a lack of affordable housing for many local people and undermining rural social cohesion;
- lack of a comprehensive and integrated transport system, resulting in social exclusion and isolation for those without access to a car;
- lack of easy access to everyday services and facilities in remote and sparsely populated areas of the region, compounded by the effect of sparsity of population on unit costs of service provision.

Friends of the Earth acknowledges the objectives of the Rural White Paper “Our Countryside: the Future” (November 2000) which sets out 4 overarching objectives for the future of rural England:

- a living countryside, with thriving rural communities and access to high quality public services;
- a working countryside, with a prosperous and diverse economy, giving high and stable levels of employment;
- a protected countryside, in which the environment is sustained and enhanced, and which all can enjoy;
- a vibrant countryside which can shape its own future and whose voice is heard by Government at all levels.

In addition Friends of the Earth believes that a rural spatial planning should be based on the following principles:

- A sustainable environment through the wise use of natural and cultural resources
- A high quality countryside with diverse and characteristic landscapes, increased biodiversity and sustainable management of soil and water
- A more appreciated and valued environment
- Balanced, empowered, inclusive communities
- Provision of integrated transport
- Fair and equitable access to services
- Highly skilled and flexible workforce

- The need to promote a diverse localised rural economy which respects the environment

These principles imply action in the following specific policy areas:

Integrated rural development

Local Planning Authorities should develop a clear vision for the integrated rural sustainable development of their rural areas, based on a rigorous understanding of local social and economic, as well as environmental, needs.

Farming and food

Farmers markets: The Curry Report emphasises the need for reconnections to be made between food production and consumption and for healthy food to be made available at affordable prices. To this end, it supports the concept of 'farmers markets' and recommends that 'city councils should provide suitable sites and facilities for farmers markets in areas that are undersupplied by retailers'.

Farm Diversification

RSS should provide a clear definition of sustainable farm diversification which, amongst other things, addresses issues of scale of development and the differences between farm diversification which is and is not related to land management. Policy guidance should clearly acknowledge that different approaches to farm diversification may be required to achieve sustainable development objectives in different areas.

LPA's should have clear criteria-based policies for farm diversification which reflect local needs and which differentiate, where appropriate, between the types of diversification activity appropriate in different types of rural area. Development Plans should address the scale of development appropriate to their rural area and how (if at all) farm diversification activities should relate to a working farm.

Businesses in rural areas

Friends of the Earth recognises the need for new rural business development so long as these are set within the principles of sustainable development. RSS policy should recognize the interdependence of the rural economy and rural environment. High landscape quality offers considerable attractions to investors and potential for niche activity in environment and eco-business, as well as being the key resource for tourism. The environmental assets need to be maintained, managed and enhanced in order to provide the opportunities for the development of the rural economy and the provision of quality jobs and a high quality of life. As a result Friends of the Earth recommends the following policy:

Rural employment opportunities

Measures to secure the economic base and sustainable development of rural areas should be included in development plans, whilst ensuring that development respects the built and

natural environment, and maintains local distinctiveness and diversity. In particular, Development Plans and other strategies should seek to:

- Retain and broaden employment, particularly in sectors important to rural areas.
- Encourage improved access to work in rural areas through such means as training, business advice, childcare and local public transport.
- Encourage investment in ICT services, e.g. telecottages, to help to address communication difficulties in remote areas.
- Promote development in towns and villages that have, or where there is the potential for, relatively good public transport links and where a reasonable balance between jobs, services and housing can be achieved.
- Reduce the need to travel to work by private car.
- Contribute to rural regeneration and help combat social exclusion.
- Encourage forms of diversification on farms which maintain the viability of the agricultural sector, and in other areas of the rural economy that support sustainable development objectives.

Rural Transport

The Government's Rural White Paper *Our Countryside: The Future* (November 2000) emphasised the lack of availability of public transport as a key problem in rural areas and stressed the importance of flexibility in providing for transport needs. The potential for using public transport, walking and cycling in rural areas is more limited than in urban areas. The dispersed pattern of demand means that it is very difficult to serve rural communities by conventional public transport. In recent years there have been considerable efforts made to coordinate the various transport services which serve such rural areas (e.g. postbus, school bus, car ambulance service, voluntary sector), in order to provide a basic level of service.

Investment in public transport measures should be promoted in Development Plans, local transport plans and rights of way improvement plans including:

- improvements to existing rail links and new stations serving rural settlements; short term protection and study and longer term reopening where feasible of key sections of disused lines;
- improved bus services between towns, including the use of Quality Bus Partnerships where appropriate;
- improved public transport interchange, other bus passenger facilities and pedestrian links in town centres;
- improvements to public transport service levels through the subsidy of bus services where justified by economic, social and environmental benefits, provision of dial-a-ride type services, co-ordination of transport services such as community and health service provision;
- road investment should be concentrated on traffic calming, cycling, pedestrian and other safety measures;

- reduction of long term public car parking provision in favour of short term reduction of on-street parking in favour of pedestrian, cycle and environmental improvements.

When considering the need for new road schemes, including village bypasses, local authorities should explore the scope for alternative solutions that do not involve major new construction, and take account of the strong presumption against damaging sensitive environmental sites.

Rural Services

In order to create and sustain rural communities that support integrated rural development, a range of services needs to be maintained in rural areas. Friends of the Earth believes that RSS should place strong emphasis on sustaining service provision and on supporting initiatives such as the Countryside Agency's 'Vital Villages' programme and the development of community based 'Parish Plans'. As a result Friends of the Earth recommends the following policy:

'Local Authorities should encourage joint planning and collaborative action by public and private service providers to promote innovative ways of maintaining or re-introducing local services in towns and village centres particularly where these towns and villages provide essential services for surrounding communities'.

Sustainable Rural Housing

In addition to the measures discussed in section 7 in relation to general housing land provision and the encouragement of low impact housing, Friends of the Earth supports the following rural housing policy:

New housing development should be concentrated within existing settlements in ways which respect their character and landscape setting. Such development should:

- Contribute to meeting affordable housing needs.
- Seek to ensure the provision of facilities necessary to local communities, including the retention and delivery of essential services.
- Encourage the co-ordination of resources to tackle poverty and promote social inclusion.
- Ensure that the needs of local communities for access to (on foot, bicycle or by public transport), and experience of, nature are protected and enhanced and, in particular, helping the vulnerable, disadvantaged or excluded groups to gain access to nature and wild space.
- Value local distinctiveness and strengthening community, cultural and environmental identity.

Useful supporting documents

1. UK Sustainable Development Strategy 1999
2. Planning Policy Wales 2002
3. RCEP 23rd Report Environmental Planning 2002
4. Transport Corridors: Blessing or Blind Alley, CPRE, March 2000
5. Greenbelts, DoE 1995
6. PPG 2 DoE 1995
7. 'Tomorrow's World', McLaren, Bullock and Yousuf, Friends of the Earth, 1998
8. PPS 6, ODPM, 2004
9. PPG 6
10. Strategy for Sustainable Farming and Food, Defra, 2002
11. National Climate Change Prevention Framework (UK Climate Change Programme 2000)
12. Communities Plan ODPM, 2002
13. Circular 02/02 TCP (residential density) Direction 2002
14. Select Committee Report (Planning for Sustainable Housing and Communities: Sustainable Communities in the South East Eighth Report, ODPM, 2003)
15. 'One million sustainable homes: Moving best practice from the fringes to the mainstream of UK housing', WWF, January 2004)
16. "By Design – Urban Design in the Planning System: Towards Better Practice" (DETR 2000)
17. DfT 'Delivering Better Transport – progress report' December 2002
18. Sustainable Development Commission 'Shows Promise But Must Try Harder' April 2004 paragraph 132)
19. 'Less Traffic Where People Live: how local transport schemes can help cut traffic' Lynn Sloman, Transport for Quality of Life, 2003).
20. 1998 White Paper 'A New Deal for Transport'
21. National Travel Survey, 2002
22. Transport for London, Congestion Charging – update on scheme impacts and operations
23. House of Commons Environmental Audit Committee "Pre-Budget Report 2003: Aviation Follow-up" March 2004 paragraph 8
24. The RCEP Report, 'Environmental Planning' 2002
25. EEAC 2001, cited in the 23rd report of the Royal Commission on Environmental Pollution, Environmental Planning, HMSO 2002
26. Countryside and Rights of Way Act 2000
27. Incineration and Health Issues, Friends of the Earth briefing, 2002
28. Toxic Tips, Friends of the Earth briefing
29. Environmental Audit Commissions (Waste – An Audit, April 2003)
30. Community Recycling Network (Maximising Recycling Rates: tackling residuals, 2002)
31. Strategy Unit's report Waste not, want not
32. MPG 3 DETR 1999
33. Rural white paper "Our Countryside: the Future" (November 2000)
34. The Curry Report
35. PPG 1
36. Draft PPS 1
37. PPG 11
38. Draft PPS 22
39. PPG 13
40. PPG 3

References

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- ⁱ 1999 Sustainable Development Strategy – A better quality of life
- ⁱⁱ PPG 2, DoE 1995
- ⁱⁱⁱ The Energy White Paper 2003
- ^{iv} Presidency conclusions of the Brussels European Council (22 and 23 March 2005); paragraphs 43-46;
http://ue.eu.int/ueDocs/cms_Data/docs/pressData/en/ec/84335.pdf
- ^v UK Sustainable Development Strategy, Chapter 4
- ^{vi} PPS 1 section 13 (ii) ODPM 2005
- ^{vii} Emissions of carbon dioxide for local authority areas -
<http://www.defra.gov.uk/environment/statistics/globalatmos/globalghg.htm>
- ^{viii} leading the way: how local authorities can meet the challenge of climate change
<http://www.lga.gov.uk/Documents/Publication/leadingtheway.pdf>
- ^{ix} Sustainable Development Strategy p80
- ^x UK Climate Impacts Programme (UKCIP02) scenarios - <http://www.ukcip.org.uk/>
- ^{xi} DfT – ‘The future of Transport: modelling and analysis
- ^{xii} Sustainable Development Commission ‘Shows Promise But Must Try Harder’ April 2004 paragraph 132
- ^{xiii} Less Traffic Where People Live: how local transport schemes can help cut traffic” Lynn Sloman, Transport for Quality of Life, 2003
- ^{xiv} Less Traffic Where People Live: how local transport schemes can help cut traffic, Lynn Sloman, Transport for Quality of Life, 2003
- ^{xv} Transport for London, Congestion Charging – update on scheme impacts and operations
- ^{xvi} House of Commons Environmental Audit Committee “Pre-Budget Report 2003: Aviation Follow-up” March 2004 paragraph 8
- ^{xvii} ‘The Future of Air Transport’ – Department for Transport, December 2003
- ^{xviii} “The RSS must set out the Secretary of State’s policies (however expressed) in relation to the development and use of land within the region” – Planning and Compulsory Purchase Act 2004, chapter 5 part 1
- ^{xix} ‘IPCC Special Report – Aviation and the Global Atmosphere’ – InterGovernmental Panel on Climate Change 1999
- ^{xx} ‘The Future of Air Transport’-Department for Transport, December 2003
- ^{xxi} ‘Minister says tax could cut airline pollution’ – the Guardian, 22nd September 2005
- ^{xxii} In all the English regions except London, UK residents spend at least 3 times more abroad than foreign visitors spend in the UK, an annual deficit to the UK economy of £15billion, see:- “Why Airport Expansion is Bad for Regional Economies” – Friends of the Earth, August 2005, see:-
http://www.foe.co.uk/campaigns/transport/news/regional_economies.html
- ^{xxiii} At both Birmingham and Newcastle airports, there has been a decline in direct employment by the airport at the same time that passenger numbers have risen sharply. At Birmingham the number of jobs fell by 1000 between 1994 and 2004, at Newcastle it fell by 1850 between 1999 and 2005. Source (in both cases):- the airport.
- ^{xxiv} In September 2005 it has reached \$60+ per barrel
- ^{xxv} East of England Plan Sustainability Appraisal Report”, Nov. 2004 (incorporating the Report of the Strategic Environmental Assessment), Appendix D
- ^{xxvi} ‘The Implications of the Aviation White Paper-for South East England: Understanding the Evidence Base’ – Roger Tym & Partners for SEERA, April 2005
- ^{xxvii} Full report and summary available on the Friends of the Earth website at:-
http://www.foe.co.uk/campaigns/transport/news/tyndall_launch.html
- ^{xxviii} Decarbonising the UK – Energy for a Climate Conscious Future, 2005, p. 47
- ^{xxix} Available on the Tyndall website at:- http://tyndall.e-collaboration.co.uk/media/news/latest_news.shtml