

Briefing

Local Plans: A Campaigner's Guide

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Part 1

About this guide

This guide explains what Local Plans are, why they matter and how you can get involved in their preparation. It is designed to help communities and residents understand the planning system and provide advice on how to get involved in local planning through Local Plans. Part 2 of the guide focuses on planning policy and provides some policy examples from adopted and emerging Local Plans.

Why get involved in planning?

The English planning system is complicated, and you might think “why bother?” But the planning system, and Local Plans in particular, guide decisions on new development and so will ultimately shape your local community and have a major impact on your environment, your quality of life and that of future generations. By engaging with the planning system and the preparation of your council's Local Plan, you can help ensure that development is planned from the outset to be sustainable, resilient, and driven by community needs.

2023 deadline for councils!

Local plan intervention

The UK government has the power to intervene in plan-making under the Planning and Compulsory Purchase Act 2004 section 27. To that end, the Secretary of State has written to some authorities where progress towards plan adoption has been slow, threatening to intervene unless the planning authority takes steps to address this. Last year government announced they intended to create an "A-team" of experts to assist under-resourced authorities with plan-making.

In March 2020 the government set a deadline for all councils to have an up-to-date Local Plan in place by Devenber 2023 or face intervention ([Planning for the Future](#)).

The land-use planning system

Most people think of the planning system in terms of individual decisions taken when someone wants to build something. Planning decisions, however, are taken in light of a body of national and local policy. So there are very good reasons why we should seek to influence planning policy by getting involved when plans are being drawn up, instead of waiting for a development proposal to reach the stage of an individual planning application (by which time it may be too late).

There have been numerous planning reforms over the past decade. For development plan purposes, current arrangements are as follows:

- **Local Plans:** prepared by local councils, unitary authorities, or district councils in two-tier areas (where there's a county as well as a district council) or councils working together to produce a joint plan. Local Plan policies set out what development can happen where. The plan must be in line with the National Planning Policy Framework (NPPF) and, where they exist, strategic plans, Spatial Development Strategies and Neighbourhood Plans.
- **Spatial Development Strategies:** prepared by mayoral-led authorities. Not all places have these. Arrangements depend on individual devolution agreements.
- **Joint Strategic Plans:** councils work together to produce a joint strategic framework for their own Local Plans.
- **Neighbourhood Plans:** prepared by neighbourhood forums, parish councils and town councils. A more local tier of planning. They must be in line with the Local Plan, NPPF and, where they exist, strategic plans/ Spatial Development Strategy.

Plan-led system

In England we have a plan-led system. This means that the development plan provides the starting point for deciding a planning application unless material considerations indicate otherwise. Section 38(6) of the Planning and Compulsory Purchase Act is clear in this regard.

The Local Plan, together with (where applicable) the Neighbourhood Plan, Joint Strategic Plan and/or Spatial Development Strategy make up the statutory development plan for an area. If a proposed project conforms to the development plan, there's a legal presumption councils will allow it. If it doesn't, they have grounds to refuse. Of course it's not that simple in practice. A lot depends on the interpretation of planning policies, the specifics of a development proposal and wider circumstances and evidence, which is why it matters that planning policies address the key issues, are well written, robust (ie, can stand up to challenge in court) and supported by evidence.

Presumption in favour...

The National Planning Policy Framework (NPPF) sets out a "presumption in favour of sustainable development". This essentially means the local authority will have to approve a developer's planning application (eg, for a housing development) if there's no plan in place, the plan is out of date, there's no 5-year housing land supply or housing delivery falls substantially short of requirements unless there are very strong reasons not to.

Developers will be able to apply speculatively. Where this happens, the checks and balances provided by a Local Plan may not apply. The result could be development which is unsustainable and contrary to the Local Plan (where one exists or is being drawn up).

The flow chart on page 9 gives you an idea of how the system fits together. It might look complicated, but hopefully this guide will help shed some light.

Sub-regional planning

The abolition of regional strategies in 2010 left a strategic planning gap. Outside London, which kept its London Plan, there was no longer a mechanism to work in a planned way on larger-than-local issues, such as growth plans and future housing provision. To address this gap, government introduced a "duty to co-operate", requiring planning authorities to co-operate on issues that affect more than one local authority area.

New forms of sub-regional and strategic planning are now emerging. These include Spatial Development Strategies prepared by city-region and mayoral-led authorities, and strategic plans prepared by planning authorities working together.

Under devolution arrangements mayoral-led and city region devolution deals have granted powers to Greater Manchester, Liverpool City Region, North of Tyne, Sheffield City Region, Tees Valley, West Midlands, Greater Lincolnshire, West of England and East Anglia. Devolution agreements vary – not all grant strategic planning powers, and some focus more on transport and economic development. London has had for some years a Spatial Development Strategy, known as the London Plan, the first one adopted in 2004. Mayoral combined authorities granted the power to prepare a Spatial Development Strategy are Greater Manchester, Liverpool City Region and West of England. At the time of writing, Spatial Development Strategies are being prepared for Liverpool City region and London. A new London Plan underwent examination in 2019 and is expected to be adopted in 2020. Sheffield City Region is to prepare a non-statutory spatial plan.

Some authorities are working together to prepare a Joint Strategic Plan. Areas covered include Greater Exeter, Oxfordshire, South Hertfordshire and South Essex.

Arrangements for sub-regional planning vary from place to place. However, since these plans influence both the preparation of Local Plans and local planning decisions, it's worth trying to influence them. If you're part of a local group or Climate Action group, contact your regional campaign co-ordinator for the latest information on these plans.

London Plan

The London Plan is the Spatial Development Strategy for the Greater London area, written by the Mayor of London and published by the Greater London Authority. Work on a new London Plan began in 2017, with public consultation on a draft plan in 2017 and 2018 and examination in 2019. Once the new London Plan is adopted it will replace the current plan (March 2016).

Greater Manchester Spatial Framework (GMSF)

The GMSF is currently being prepared by the Greater Manchester Combined Authority. Consultation took place in early 2019, with further opportunities to comment expected in 2020. The GMSF sets out housing and employment growth aspirations across Greater Manchester, covering the 10 authorities of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Stockport, Tameside, Trafford and Wigan and aims to achieve net zero carbon emissions ahead of the national 2050 target. At the time of writing it is unclear whether the GMSF is to be a Spatial Development Strategy or a joint development plan since consultation carried out to date has been under the regulations covering Local Plans. It is understood that aspirations are for the GMSF to be progressed as a Spatial Development Strategy ([Greater Manchester Spatial Framework Update 27/9/2019](#)).

Duty to co-operate

The duty to cooperate was introduced by the Localism Act 2011. Under the duty, planning authorities and certain other bodies must co-operate with each other with regard to strategic, cross-boundary matters, such as housing requirement and distribution, infrastructure (water, waste, transport) and other strategic issues. Since being introduced, the duty has had mixed results, not least because it requires authorities to co-operate, not agree. Since July 2018, planning authorities have been required to produce a statement of common ground. The duty applies to both strategic and local plan making bodies.

Local planning

At the local level, plan-making is carried out as follows:

- Neighbourhood Plans prepared by parish and town councils and neighbourhood forums.
- Local Plans prepared by local planning authorities (district and unitary councils).
- Minerals and Waste plans (a type of Local Plan) prepared by county councils and some unitary authorities.

All these plans must take into account of national planning policy and planning practice guidance.

What is a Local Plan?

The Local Plan sets a framework for how an area will develop in future, usually over the next 15 years. The plan sets out strategic policies, land allocations, infrastructure, housing, employment, leisure and retail requirements, and policies concerned with

safeguarding the environment, climate change adaptation and mitigation. The plan may also include more detailed policies on matters such as design.

A Local Plan may comprise either a single document or several documents. Authorities are moving away from the local development framework folder of documents approach, opting instead to produce the plan as a single document. Some places have renamed their local development framework or core strategy as their Local Plan. Where more than one document is produced, a typical approach is for the plan to comprise two parts: part 1 covering strategic policies and part 2 covering development management policies and site allocations.

In summary, a Local Plan is made up of the following:

- Strategic policies
- Policies map
- Non-strategic policies, including more detailed policies for specific areas, neighbourhoods or types of development
- Area Action Plan (optional, produced where needed).

Related documents

Other documents prepared which relate to plan-making but which don't form part of the Local Plan are considered below. Some are required and others are optional.

Supplementary planning documents

Supplementary planning documents (SPDs) provide more detail in support of policies within the Local Plan. They can help explain how a particular policy works and demonstrate through practical examples how a policy requirement might be met or, conversely, would fail to be met. SPDs should not include new policies. SPDs are taken into account in planning decisions but carry less weight than policy as they have not been through examination.

Preparation of SPDs is optional though most, if not all, planning authorities prepare SPDs covering a wide range of topics. SPDs will be listed on the local authority website (see reference section for examples). A typical list might include SPDs on affordable housing; control of hot food takeaways and betting shops; design; houses in multiple occupation (HMOs); house extensions; landscape character; nature conservation; open space; shopfronts; security and signage: sustainable drainage systems and flood risk; sustainable travel and development; and specific sites and locations (eg, seafront, town centre, redevelopment area).

Camden Council's Air Quality SPD is a good example of providing additional policy

guidance on a topical environmental issue, presenting more detail on Air Quality Management Areas (AQMAs) and their role in planning decision-making.

Local development scheme (LDS)

The Local Plan, supplementary planning documents and other plan documents may be in the process of being reviewed, updated or replaced at any time, and it can be difficult for campaigners or community groups to know where things stand with their Local Plan.

This is where the Local Development Scheme (LDS) comes in. The LDS sets out a timetable of which plan documents will be prepared when, in what order and whether they'll be jointly prepared with other Authorities. The LDS is available on your local planning authority website. It's worth bearing in mind that delays in the timetable for preparing plans can mean some LDSs quickly become out of date. We recommend contacting your council or keeping an eye on their website to give you a better idea as to what stage they are currently at, upcoming public meetings and meetings of the council committee who oversee Local Plan preparation, and the date of the next public consultation.

Planning authorities have to prepare an LDS, make it available on their website and keep it up to date, so do keep an eye out.

Statement of Community Involvement (SCI)

The SCI sets out how your local planning authority intends to involve the community in planning. It's very important that the council's planning consultations allow for full participation of local communities in shaping the future of their area, are accountable, and allow for a right of redress in land-use decisions. Questions which should be asked of a local SCI include:

- Does it help people to know what's going on?
- Does it allow them to shape decisions?
- Does it provide for meaningful public consultation and opportunities to participate, or is it just a tick box exercise?
- Does it give people an opportunity to seek redress if the process lets them down?

Sustainability Appraisal

The Local Plan must be subject to a Sustainability Appraisal (SA). The purpose of the SA is to appraise the social, environmental and economic effects of a plan from the outset. The SA is an iterative process that is developed along the way and should inform the preparation of the plan, at each stage. Provided the SA is carried out well, and its recommendations reflected in amendments to plan policies, it should help ensure a Local Plan in its final form – and importantly the policies and site allocations it contains – provide a basis for sustainable development. The SA is consulted on alongside the plan

and forms a key part of the Local Plan evidence base.

Public involvement

The public has a crucial role to play in the plan-making process. Your local authority SCI will set out how it intends to involve the public in drawing up the Local Plan. However, SCIs can be quite general, so it's worth contacting the planning policy team in your local authority to find out how to get involved with the Local Plan and upcoming consultations.

Examination

Local Plans are subject to an Examination carried out by an independent planning inspector. Public hearings form a key part of the examination, and anyone who has made written representations (to object) has the right to attend and be heard. The inspector determines matters and issues for discussion at the hearings. The examination can last anything from a few months to over a year, depending on the length and complexity of the Local Plan being examined.

An important piece of legislation in regard to the Examination is the [Planning and Compulsory Purchase Act \(2004\)](#):

20 (6) Any person who makes representations seeking to change a development plan document must (if he so requests) be given the opportunity to appear before and be heard by the person carrying out the examination.

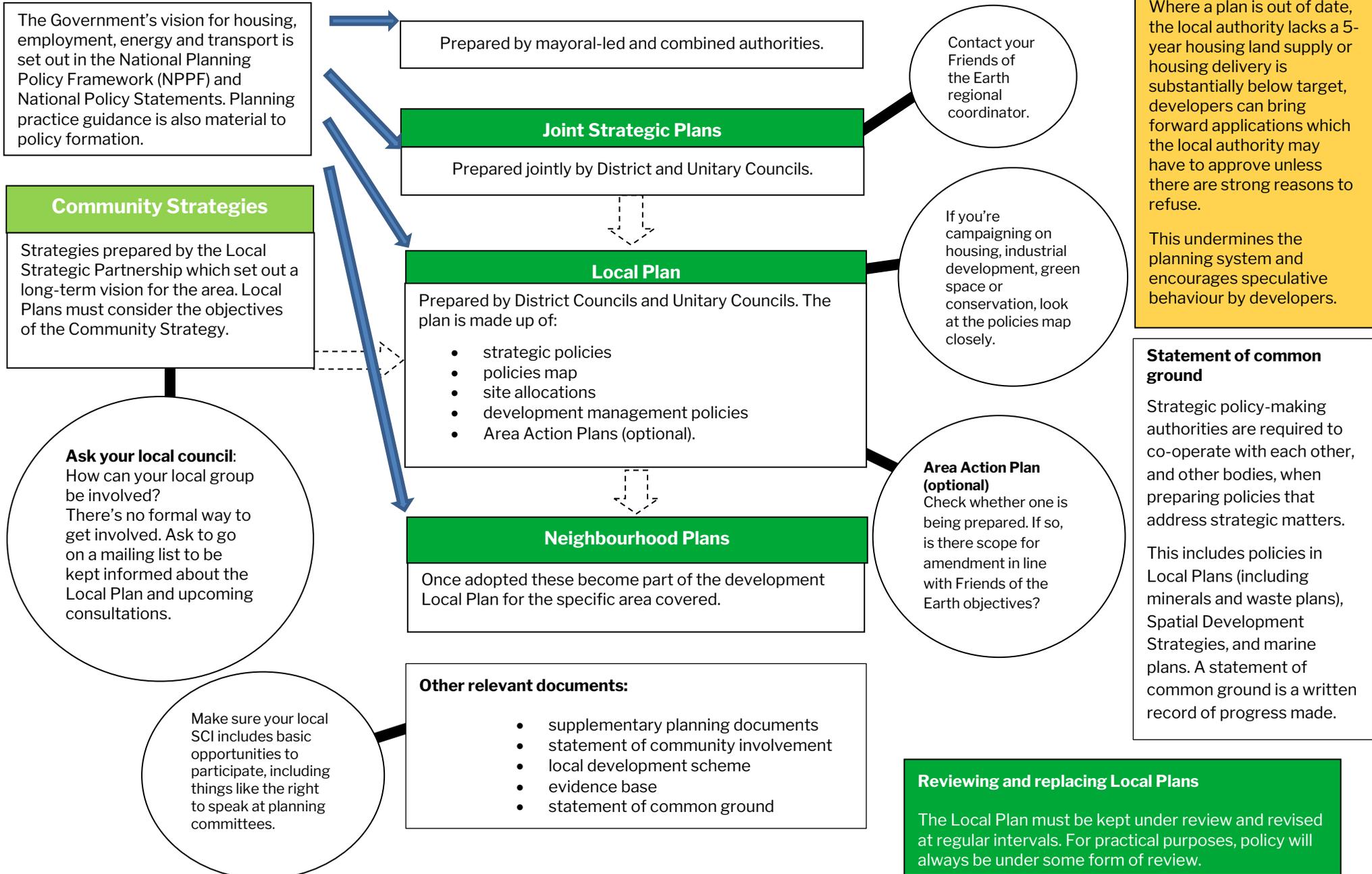
This approach is also supported by [Planning Practice Guidance](#) (para 056 Reference ID: 61-056-20190315, revised: March 2019)

The job of the inspector is to assess whether the plan is "sound" (that is, positively prepared, justified, effective and consistent with national policy) and legally compliant. They may recommend modifications to the plan (main modifications) to ensure that it's "sound".

Sometimes, where a lot of work is required to make the plan "sound", the Local Planning Authority will withdraw the plan to make changes and then consult on said changes. Where the inspector feels that the plan can be made "sound" with some modifications, the Local Planning Authority can request that the inspector recommends these changes. The Local Planning Authority has to consult on these changes and the inspector has to consider the responses received before the Plan can be adopted.

On page 9 you can see a diagram of how some of these decisions are made.

The English planning system and local plans



The Local Plan preparation process in England

Key stages	What you can do
Your local council will draw up a Local Development Scheme	Get hold of a copy (online) and check for consultation updates! Also refer to our overview of LDSs.
Council planners gather evidence and come up with options	You could be proactive and write to councillors and planners with your ideas and suggestions at any time – even if the plan’s in place, it will be reviewed at some point.
Issues and Options	This is the first stage and provides an opportunity to be consulted on what the plan should contain and key issues it should address before the plan is developed further. Councils have flexibility about how they choose to consult during the early stage of preparing their plan. Methods used may include publication of consultation materials, leaflets and booklets, exhibitions, and public meetings. There will be opportunities for you to give your views. Find out how by visiting your council website or contacting your local plans team.
Consultation	Use Friends of the Earth Local Policy Guide (part 2) to help you respond.
Preferred Options/ draft plan	Planners draw up and refine policies based on feedback received – and consult the public and wider stakeholders on these.

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Consultation	Use Friends of the Earth Local Policy Guide (part 2 of this guide) to help you respond.
Publication. The council publishes a final version of the draft plan.	This is your opportunity to make formal representations to object to or support the plan and policies which it contains. You must object in order to be heard at the Examination in Public (EiP).
Consultation	Use Friends of the Earth Local Policy guide (part 2) to help you respond.
Examination carried out by a planning inspector who will hold an Examination in Public (EiP)	This is your only right to be heard in person (where you have previously objected) or make written representations.
Inspector's report	The inspector has the final say on whether the plan is "sound".
Adoption. The Plan is formally adopted by the council.	You can seek redress if the process has not been properly followed by a form of legal challenge known as Judicial Review.
Reporting and monitoring. Your local planning authority prepares an authority monitoring report at least once a year. This should set out progress with Local Plan preparation, report on activities relating to the duty to co-operate and record progress in implementing plan policies and achieving targets.	Read the monitoring report to check progress with plan preparation, policy delivery and whether plan targets have been met or are on course to be met. Call for key policies and targets to be monitored and reported on when responding to your Local Plan consultation.
Review	Ask your local authority how you can be involved in the development of new policy.

Getting involved in local plan-making, whether by responding to consultations or proactively seeking to influence the development and direction of policy, is your chance

to get rid of bad policies and promote good ones. For example, bad policy approaches may include green belt housing, new road infrastructure, fracking, greenfield retail and logistics development, and so forth. Good approaches include policies to deliver renewable energy and zero carbon development, sustainable affordable housing, thriving town centres, walking and cycling infrastructure, community facilities, and a healthy environment including clean air, soil and water. Also needed are policies which support nature's restoration and recovery and the protection and creation of accessible green space, wildlife habitat and woodland.

The Neighbourhood Plan preparation process in England

Neighbourhood Plans allow local communities to have a say in aspects of development in their area. They are not required, but communities may choose to prepare them if they wish. The process allows a neighbourhood forum, town or parish council to create a plan relevant to their neighbourhood. The local planning authority has a statutory role to play in supporting neighbourhood planning, providing advice and assistance and taking decisions within the time limits that apply. Funding is available to support groups who wish to prepare a neighbourhood plan.

The area to be covered by the neighbourhood plan has to be agreed with and designated by the local planning authority and is known as the neighbourhood area. This generally – though not always – covers a small area. In places with a parish or town council the boundary of a neighbourhood area is usually the parish or town. A Neighbourhood Plan can cover more than one parish.

The Neighbourhood Plan must be consistent with national planning policy and guidance, strategic policies in the Local Plan and where relevant, the Spatial Development Strategy. Neighbourhood Plans undergo examination by an independent person, usually a planning inspector, who checks the plan meets certain conditions, and if it does a referendum is then held. Where a majority voting support the plan, it's then adopted ("made") by the local planning authority and forms part of the statutory development plan for the area. This means the local planning authority must take the Neighbourhood Plan into account when deciding planning applications.

People or organisations proposing new development in a neighbourhood area which has a plan will have to adhere to the policies of the Neighbourhood Plan. In summary, Neighbourhood Plans can contribute to:

- deciding what development should be allowed to happen and where;
- providing more bespoke design policies in terms of what development proposals will look like and how they can best respond to the characteristics of the neighbourhood area;
- addressing needs specific to the neighbourhood area and aspirations of the community as reflected in the NP;

- designating local green space; and
- promoting development in line with the aims and aspirations of the NP.

As well as setting out planning policies, Neighbourhood Plans can allocate sites for development. Neighbourhood Plans **cannot** contradict strategic policies set out in a Local Plan, such as housing delivery targets, housing, and employment allocations. Nor can they be used as a tool to prohibit development. They are nonetheless a positive tool that can help better define the type, design and location of development within a neighbourhood area in line with community needs and aspirations.

Stages of the Neighbourhood Plan Process	What you can do
In parished areas: parish council or town council decide they'd like to prepare a Neighbourhood Plan and apply for the neighbourhood area to be designated.	Find out whether your local parish or town council is preparing a plan (or looking to prepare one). If not, suggest they do.
In unparished areas: a local organisation or group applies to become a neighbourhood forum for a specific area. Local authority makes the decision to give neighbourhood forum status to an organisation and agrees the neighbourhood area it covers.	Find out whether a neighbourhood forum has been or is being set up in your neighbourhood. If not, join up with others to set one up.
Neighbourhood forum or parish/ town council prepare plan.	Join a neighbourhood forum, or attend parish council or forum meetings as an observer. They may welcome volunteers to assist in preparing the plan. In parish and town councils a steering or advisory group oversees plan preparation. Tasks may include helping with surveys, collecting evidence, preparing consultation material, organising meetings and publicity, and researching and writing plan policies.
Plan/ order goes out for consultation	Use Friends of the Earth Local Policy Guide (part 2 of this guide) to help you

	respond in terms of suggesting alternative policies. Use your local knowledge of areas and issues to back up your views.
Local authority checks the plan/ order	You can also raise any issues regarding national or strategic planning policy or other requirements, if you think that the Neighbourhood Plan doesn't cover these issues and should or requirements haven't been met, such as for consultation.
Examination	You may not be able to participate in the Examination, as hearings aren't normally held, but you can submit written evidence. Make sure yours is well-researched and considered. Keep a copy for future reference.
Report: the Examiner prepares a report	Read the Examiner's report.
Local authority organises a referendum on whether to adopt the Neighbourhood Plan. This is the final check on the plan or order going ahead.	Vote in the referendum. Over half of those voting have to vote in favour in order for it to be passed.
Plan adopted ("made")	You can seek redress by a legal challenge known as Judicial Review.
Renewal	The plan will need to be refreshed to be kept up to date.

How you can get involved

Regionally

If you're a member of a Local or Climate Action group, contact Friends of the Earth's regional campaign officers. Opportunities to get involved at the regional level vary depending on the type of plan being prepared, but you can ask for information and report failures to respond to the Ministry of Housing Communities and Local Government.

Locally

- Ask your local authority if you can go on their contact list to be kept informed of forthcoming consultations on the Local Plan.
- Get hold of the Local Plan and submit a response to the consultation. Object to any bad policies, suggest or support better ones, and get involved in the Local Plan examination.
- Obtain a copy of the latest Local Development Scheme (LDS) from your local council and share it with your group. You may need to check with council planners that the online version is up to date. This will give you the timetable and the scope of the plan.
- Find out what stage your council is at in writing its Statement of Community Involvement (SCI), and ask them to include the major principles along the lines we suggest in this guide.
- Find out whether any Area Action Plans are being prepared or proposed for your area.
- Look at the policies map. Are the proposed sites and locations for development and growth sustainable? How do they measure against policy? Would development be car dependent, or will future occupants be able to travel mainly by walking, cycling and public transport? Would developing here lead to a loss of greenspace, woodland or habitat? Does evidence support the site allocation? Can you suggest better, more sustainable alternatives?
- **Neighbourhood level**
 - Get involved with your Neighbourhood Plan. If there isn't one already underway, join with likeminded people and set about preparing one.
 - Speak to your local parish council members or your local council to see whether a neighbourhood forum exists in your area.
 - Familiarise yourself with your Local Plan policies, especially as the Neighbourhood Plan will have to be in accordance with strategic policies in the Local Plan.
 - Think how Neighbourhood Plan policies could enhance aspects of the Local Plan in your area. Once Neighbourhood Plan policies are adopted, development proposals would have to take them (and the entire Neighbourhood Plan) into account.
 - Speak to others in your local area and get ideas going. Your first step should be an application to designate a neighbourhood area (where the applicant is a parish or town council) or to be recognised as a neighbourhood forum (in places with no parish or town council).

Friends of the Earth offers a forum for people to discuss planning issues but unfortunately is unable to provide individual Local Plan or Neighbourhood Plan advice.

Top tips on submitting responses to your local planning authority

1. Intelligence

In order to mount the best planning case, you need to make sure you know about the Local Plan process early. You can find out about Local Plan progress via various routes:

- Check the council web site
- Read noticeboards in libraries, community centres and other places in your local neighbourhood
- Check the local press
- Talk to local councillors
- Write to your Council to say you're interested in knowing more about the new Local Plan. Request to be kept informed of key stages of Local Plan preparation and for your name to be added to their consultation mailing list.
- Search the [Lists on Plan Progress](#) maintained by the Planning Inspectorate (NB these are comprehensive but do not list plans at an early stage of preparation).

2. Building Good Relationships

- It pays to be on good terms with your local authority planners, especially policy planners who will be tasked with writing new policies and overseeing public consultation. Some may welcome suggestions on an ongoing basis (outside formal consultations as well as during them).
- Try to meet planning officers face-to-face to make them aware of your concerns and aspirations. They'll be able to explain local policies to you and how you can engage in the plan-making process.
- Build links with other community-based organisations, and team up on joint planning objectives.
- Talk to councillors, but understand their position at public meetings – getting angry with them may not help your case.
- Make sure you have a clear message for the media and public about the impacts that Local Plan proposals and policies will have. Local media often relish planning battles, but you don't always want to be portrayed as a negative force. For example, you could say you welcome new development, but this must be built and designed in the right way and in the right place, respond to genuine local needs, and be environmentally sustainable. Ask yourself: does the proposed plan

provide the basis for this?

- Remember that this battle could be a long one, so keep some good stories up your sleeve to keep the media interested.

3. Focus

It's important to concentrate your fire in order to have maximum effect. Rather than trying to say something about everything in your draft Local Plan, you need to work out the key areas of concern and turn them into powerful arguments.

As well as objecting to policies you disagree with, it pays to indicate your support for policies you consider particularly good. This is because some organisations and individuals will seek to undermine aspects of the plan which relate to, say, developer contributions, environmental protection, and affordable housing, and will call for policies to be deleted or watered down. Where no support is shown for a particular policy, the council may be more inclined to modify it in ways that make it less effective or omit a policy altogether. You may want to support some policies conditionally, where these are along the right lines but need amendment to the wording to be effective.

When seeking a change in wording, ideally you should suggest your preferred wording, but you don't have to and can broadly indicate what change you seek and why.

In Planning Speak, your local authority will ultimately have to prove that their plan is "sound". The Local Plan will be examined by a planning inspector who will assess whether the plan meets legal and procedural requirements, and passes the tests of soundness within national planning policy. The National Planning Policy Framework advises that a Local Plan is "sound" where it is:

Positively prepared: providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it's practical to do so and is consistent with achieving sustainable development.

Justified: an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.

Effective: deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

It's worth thinking about what evidence you might draw on for a response to a particular policy or site allocation when making your representation, whether supporting or objecting to the Local Plan, or when talking to planners and councillors. To what extent does the Sustainability Appraisal, which forms part of the Local Plan evidence base, lend support, or otherwise, to a particular policy or site allocation? Similarly some of the council's other technical studies published alongside the emerging plan or others you are aware may have helpful material you can use to bolster your case. You may find that for some policies there appears to be a lack of evidence – in which case this point is worth highlighting.

You should also think about whether your local policy is “in accordance” with policies in the NPPF. But remember that NPPF policies can appear to be in conflict with each other (for example, it simultaneously advocates for development and protection of a wildlife site). Some policies will be considered more important than others and carry more weight, as planners and councillors ultimately have to make a balanced judgement. It's therefore really important that you can draw on evidence which shows how important your policy (or a change you are seeking to a policy or policies) is to delivering sustainable development according to the definition set out in the NPPF.

Responding (Summary):

Be aware of upcoming consultations and keep up to date with what is happening with the Local Plan (or minerals plans for policies linked to fracking, mining, minerals extraction, quarrying and waste) so that you can give yourself enough time to respond.

- Build positive relationships with your local planning authority and participate in public consultation events they may hold for various stages of the Local Plan.
- Make sure that you have a clear and concise plan in terms of what you feel is wrong with the draft policy and wider plan being proposed: Does it pass the tests of soundness above? How can it be improved? Try to suggest positive amendments to the plan and policies which would be beneficial for your area and are necessary to deliver sustainable development. Support good policies.
- Remember to cite evidence to back up your views, and check what the sustainability appraisal says. See Part 2 of this guide for draft policies that should give you more ideas.
- Focus on an approach to policy that aims to embrace sustainable development, ie, where environmental, social and economic aims can be achieved together rather than traded off, and measures necessary to tackle climate change, which respond to community needs and which enable nature to thrive.

The next part of this guide covers local plan policies and some of the matters they should cover. It also provides examples of policies derived from actual Local Plans and suggested wording drawing on key principles and criteria we would expect, or wish, to see in plans going forward.

Part 2: Planning policy guide

This policy guide aims to provide advice you can use when getting involved with plan-making, such as when responding to a consultation on a Local Plan. You may also find it helpful when responding to consultations on other plans, such as a Joint Strategic Plan or Neighbourhood Plan. Our policy suggestions take into account the National Planning Policy Framework (2019), the UK zero-carbon target and 25 year Environment Plan, as well as other legislation and emerging good practice.

It's important that both national and local government are held to binding commitments on sustainable development and climate change. Meeting these commitments is challenging under current national policy and regulations. UK government needs to make significant changes for Local Plans to deliver fully on sustainable development and climate change commitments. Furthermore, matters aren't helped by the possibility that each local planning authority may "interpret" policy differently, and of course arguments between developers and others over what a policy means in practice. However, even within the current regulatory and policy framework much can still be achieved.

A word about planning policy

Don't be put off by the jargon that goes with planning policy. At heart, it's all about delivering the right development in the best place. Don't feel you have to dress up what you say in special language. We've got two top tips:

1. When you read a plan you'll find some text in **bold type**. This is the **key policy** which will be applied by the council. Other normal text that goes before or after the policy explains the policy but doesn't carry the same importance and is called the policy justification or supporting text.
2. Use plain English where you can but reference the National Planning Policy Framework, the council's evidence base, and other evidence you consider relevant. Take note where you can of reports and comments by statutory bodies, such as Natural England or the highways authority and what the sustainability appraisal says. This will make your submission much more effective.

1. Sustainable development

Sustainable development should be at the heart of the future development of our society. It provides planning with its core purpose to enhance the quality of life of communities by steering development towards sustainable locations and developing in a way which respects environmental limits. Such development should seek to promote social equity over private gain and the wise use of limited natural resources to protect the interests of future generations.

Government policy can help support your arguments. The National Planning Policy

Framework (NPPF) paragraph 7 states:

“The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.”

The NPPF goes on to explain that “achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives).” These objectives are as follows:

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

(NPPF, para 8)

Friends of the Earth promotes the following sustainable development principles in land-use planning:

- **Environmental justice:** putting people at the heart of decision making and reducing social inequality by upholding environmental justice in the outcomes of decisions.
- **Inter-generational equity:** ensuring current development does not prevent future generations from meeting their own needs. (“At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs” NPPF, para 7).
- **Environmental limits:** ensuring that resources are not irrevocably exhausted or the environment irreversibly damaged. This means for example, supporting

climate protection by reducing harmful emissions, protecting and enhancing biodiversity and promoting the sustainable use of natural resources. (“support the transition to a low carbon future in a changing climate” NPPF, para 148).

- **Resource conservation:** ensuring that planning decisions assist in the prudent and sustainable use of finite natural resources (“use natural resources prudently” NPPF, para 8).

While the NPPF may not explicitly set out these principles it should be possible to argue for their inclusion in Local Plans by citing relevant paragraphs along with wider evidence, policy and legislation. Lastly, there are two further key principles on which the NPPF is silent, as follows:

- **The precautionary approach:** the precautionary principle holds that where the environmental impacts of certain activities or developments are not known, the proposed development should not be carried out, or extreme caution should be exercised in its undertaking.
- **The proximity principle:** seeking to resolve problems in the present and locally, rather than passing them on to other communities or future generations.

Local Plan policies should be encouraged to reference these principles, as they are relevant to development which presents significant unknowns, such as fracking.

The UN General Assembly resolution on Sustainable Development 42/187 underlies the NPPF definition of sustainable development. In 2015 the UK signed up to the United Nations Sustainable Development Goals, many of which are relevant to planning and could usefully inform planning policy approaches. Disappointingly, the 2019 revision of the NPPF no longer references the UK Sustainable Development Strategy’s five guiding principles, though these remain relevant. While remaining within the broad parameters set by the NPPF, it’s possible to take a locally distinctive approach tailored to local circumstances, so long as the evidence justifies this.

Friends of the Earth recommends the following policy wording for inclusion in Local Plans:

The Local Plan will seek to enable development that improves the economic, social and environmental objectives of [insert place name] through the application of the following sustainable development principles:

- living within the planet’s environmental limits
- ensuring a strong, healthy, and just society
- achieving a sustainable economy

- promoting good governance
- and using source science responsibly.

The council will work proactively with applicants and the community to identify solutions which mean that proposals can be approved wherever possible, in order to secure development that, as a whole, improves economic, social and environmental conditions in the area, tackles the climate crisis and supports nature's restoration and recovery.

Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in Neighbourhood Plans) and with the principles of sustainable development, and which have benefited from meaningful public participation, will be approved without delay, unless material considerations indicate otherwise.

2. The sequential approach

A key way of implementing principles for sustainable development is to adopt a sequential approach (see Glossary) to development. The sequential test is referenced for major town centre uses (retail, leisure and office development) and flood risk aspects of development, and is specifically excluded for small-scale rural development in the NPPF.

In order to achieve sustainable development, encourage sustainable modes of travel and protect and conserve areas of recognised environmental and amenity importance, Friends of the Earth advocates that Local Plans adopt the following sequential approach in policy to guide the selection of sites and locations for development:

- the re-use of previously developed land and buildings (brownfield sites) within urban areas provided it is not of high environmental value
- other previously developed land well connected to public transport links
- locations within urban areas, subject to the need to protect and conserve areas of recognised environmental and amenity interests
- other sites and locations which are well located for achieving sustainable development and reduce the need to travel.

To ensure that sustainable development objectives are met and consequently the most sustainable locations within, adjoining and outside urban areas are selected as preferred locations for development, the Local Plan should use the following criteria in establishing the suitability of individual sites:

- Accessibility of a site by non-car modes of transport, and potential to improve accessibility ("significant development should be focused on locations which are

or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes" NPPF, para 103).

- Scope to achieve carbon neutral or carbon negative development.
- 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 ("plans should apply a sequential, risk-based approach to the location of development – taking into account the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property" NPPF, para 157).
- The impact developing a site will have on the area's environmental carrying capacity and in particular, implications for resource conservation, natural resources and biodiversity ("...minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures" NPPF, para 170b).
- The impact developing a site will have on the area's cultural resources. Local authorities should recognise the contribution of heritage assets (eg, listed buildings and scheduled monuments) to the social and economic well-being and regeneration of an area ("...These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations" NPPF, para 184).
- The impact developing a site would have on pollution levels. Local authorities should recognise existing problems of poor air, water and soil quality and acknowledge the potential negative cumulative impact further development will have on these areas ("...Planning policies should contribute to and enhance the natural and local environment by preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality" NPPF, para 170e).
- The suitability of sites for mixed-use development and the social, economic and environmental benefits this might bring local communities.

The above can be described as a general, strategic policy, providing overarching principles to guide site selection. These principles should apply from the outset, for example, when assessing the suitability of sites and locations and throughout all stages of Local Plan preparation. Finally, they should also be part of a development management policy.

3. Employment land

The Local Plan will seek to allocate land to meet future employment requirements, and the council usually commissions or carries out a technical study to identify these. Requirements can be met by allocating new sites for employment, if needed, and/ or by making better use of existing employment land and buildings. Examples of the latter may include upgrading and repurposing – for mixed use or a different employment use, creating additional floorspace by adding additional storeys, increasing the built area of a site by building on spaces formerly occupied by surface car parks, improved (preferably non car) transport links, or some combination of these.

Site allocations are shown on the Local Plan policies map (formerly called the proposals map) and referenced under site allocation policies. The local authority's basis for deciding which sites to allocate should follow the sequential approach described above to ensure that redevelopment of brownfield sites and re-use of existing employment sites is given priority over developing greenfield sites, and that strong emphasis is placed on the re-use and conversion of existing buildings (NPPF, paras 83, 84, 117, 138, 145g).

The Local Plan should make provision for smaller, flexible employment sites where these can help diversify the local economy and lead to the development of indigenous business, in particular self-employed workers and start-ups. Local authorities should phase the release of such sites to ensure that priority is given to sites on previously developed land. In identifying suitable sites, local authorities should have regard to:

- the sequential test, which places an emphasis on the reuse of developed land as well as a site's accessibility by public transport, walking and cycling
- their contribution to areas in need of regeneration and other areas of high unemployment, where it is likely that investment will be required to make the sites attractive to investors
- local landscape and environmental factors
- facilitating and supporting the growth of green jobs, sustainable enterprise and the green economy
- suitability for small business needs (eg, size and accessibility).

It's worth questioning assumptions made in economic needs assessments (sometimes called housing and economic needs assessments, or HEDNA). These studies form part of the Local Plan evidence and directly inform land requirements. Some studies underplay changing trends in the workplace (such as flexible working arrangements and hot desking) and emerging sectors of the economy. This can result in overestimating floorspace and land requirements for some economic sectors and underestimating for others, so the basis for calculating these requirements, and underlying assumptions, should be made clear.

While local authorities are expected to follow a prescribed methodology set out in [Planning Practice Guidance](#) to calculate how much employment land to plan for, how studies are carried out varies in practice. More importantly, there's scope for Local Plan policy to positively encourage and provide for those sectors needed to facilitate the development of a low-carbon, environmentally sustainable, circular economy.

In recent years many places have lost office space as a result of permitted development rights which allow the conversion of offices to homes without the need to make a planning application. Loss of offices in sustainable town centre locations is problematic as replacing them may be economically unviable due to the high cost of land. Where there's a continued need for office space ([categorised as B1 – see Use Classes Order](#)), planning authorities sometimes respond by allocating employment sites out of town and, in some cases, on greenfield sites in car-based locations. This is unsustainable. It's therefore important that Local Plans seek to protect well-located employment sites where there continues to be a need, and that local authorities use mechanisms such as "[Article 4](#)" to restrict permitted development rights, especially where there's a continuing need for offices, or expected to be so in future.

Lastly, a mixed use policy can help support a balance of uses, providing employment space alongside, for example, retail, housing, leisure and community uses. Residents benefit from close proximity to facilities and potential jobs, while business benefit from proximity to customers.

4. Town centres and retail development

The NPPF states that "planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation" (para 85).

There's growing recognition of the damage that out-of-town development can cause to the vitality of our high streets by diverting trade and customers away from town centres. Large format stores located on the edge of town centres can cause similar damage. As a result, town centres suffer in terms of shop vacancies and reduced footfall as fewer customers visit the centre. Town centres face growing competition from changing shopping habits, in particular online retail. Adaptation and diversity are key to their long-term future, supported by a robust local planning framework.

The NPPF advocates a sequential approach which favours town centre development first, followed by edge of centre. Out-of-town development should be considered as a last resort only where other suitable options are unavailable (NPPF, para 86).

Where a retail or leisure development is proposed outside a town centre on a site not allocated in an up-to-date Local Plan, the proposal will be subject to an impact assessment if the size of the scheme exceeds the NPPF default threshold of 2,500sqm or locally set threshold. Authorities may set a lower threshold in their Local Plan

provided they can justify this at Examination. Friends of the Earth strongly encourages this approach.

Paragraph 89 of the NPPF sets out that the impact test will include an assessment of the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and on town centre vitality and viability, including local consumer choice and trade in the town centre and wider retail catchment (as applicable to the scale and nature of the scheme).

In setting a local threshold, [Planning Practice Guidance](#) notes that it's important to consider:

- scale of proposals relative to town centres
- existing viability and vitality of town centres
- cumulative effects of recent developments
- whether local town centres are vulnerable
- likely effects of development on any town centre strategy
- impact on any other planned investment.

It's essential that a threshold to restrict the development of large retail stores that would otherwise damage existing retail centres is based on sound evidence.

The NPPF states: "Where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the considerations in paragraph 89, it should be refused." (para 90).

Friends of the Earth therefore recommends that all plans set a local threshold for carrying out an impact assessment of retail and leisure uses outside town centres. The right threshold will vary from place to place. This should be set at a level that prevents schemes from being approved that would harm a town centre due to their size, but is not set so low that it interferes with the provision of smaller individual shops and parades which communities require and benefit from and which Local Plan policies should support, protect and encourage.

Friends of the Earth recommends authorities adopt a local threshold tailored to local circumstances, as in this policy example from the City of York:

Retail Hierarchy and Sequential approach

Proposals for main town centre uses outside a defined city, district or local centre must be subject to an impact assessment where the floorspace of the proposed development exceeds the following thresholds:

- outside York city centre: greater than 1,500 sqm gross floorspace.

- outside a district centre: greater than 500 sqm gross floorspace.
- outside a local centre: greater than 200 sqm gross floorspace.

An impact assessment may be required below these thresholds where a proposal would have an independent or cumulative impact on the vitality and viability including local consumer choice and trade on a defined centre, or have a significant impact on existing, committed and planned public private investment in defined centres.

City of York Local Plan Publication Version 2018, Policy R1 (extract)

The Local Plan should play a positive role in communities, promoting a vibrant, diverse and locally distinctive retail offer and thriving town centres. Recognition should also be given to the role played by leisure, civic and cultural uses and maintaining a high quality public realm in successful town centres.

As well as generic policies setting out criteria which apply across a whole district or borough, a Local Plan can include policies tailored to individual town centres and designed to respond to their particular needs, circumstances and challenges.

Planning policy should reinforce investment in urban renewal by supporting the continuing role of town, district and local centres. This should include the effective use of masterplanning, development briefs, action plans and supplementary planning guidance to cover matters such as urban design, shopping parades and frontages, transport and movement, and public realm.

In assessing the need for additional retail floorspace in or adjacent to existing centres, local authorities should not simply consider the quantitative need for floorspace but should also assess qualitative considerations, such as the format in which the additional floorspace might best contribute to the vibrancy and diversity of existing retail centres.

Markets play an important role in many town centres and planning policies should "...retain and enhance existing markets and, where appropriate, re-introduce or create new ones" (NPPF, para 85). Your Local Plan should include a policy to protect local markets and allocate spaces for new ones, where possible.

Local Plan policy should ensure that in any significant new area of housing development, provision should be made for local shops and centres which:

- avoid an overall increase in travel
- provide access to essential shopping and community facilities for those without access to a car
- encourage vibrant and diverse neighbourhood/district retail centres.

Retail policy and support for the rural economy and local communities

Planning policy has a key role to play in delivering on government policies on sustainable rural economies. It should be supportive of local facilities in small- to medium-sized towns and villages which provide an effective and valuable service to the local community, particularly the elderly, disabled and those with no access to a car or those who are poorly served by public transport.

Friends of the Earth recommends the following policy approach:

Small local shops

Outside existing centres, small shops that meet the daily shopping needs of a local community will be permitted where:

- The shops are of a type and in a place that would meet daily shopping needs and this need is not already met by existing shops; and
- The shops are located and designed to encourage trips by pedestrians and cyclists and would not encourage car trips.

[Barnsley Local Plan](#), adopted 2019, Policy TC5

5. Climate change, renewable energy and heat

International targets

Land-use planning needs to play its part in addressing the climate crisis by ensuring policies take account of domestic and international legislation, commitments and targets.

The EU Renewable Energy Directive is transposed into UK law, and includes a target for 20% for each member's energy needs to be met by renewable sources by 2020, but the UK target is just 15%. Despite a reduced target and extensive deployment of renewables in recent years, the UK is not on course to meet this target. In 2018, 11% of total energy generation came from renewable sources, compared with 9.9% in 2017. Deployment of renewables in the UK needs to grow much faster and across all sectors, heat as well as power, if we are to meet our climate commitments.

As well as binding legal targets, planning policies should acknowledge international treaty commitments such as the Paris Agreement (2015). The Agreement, which the UK has ratified, seeks unilateral consensus from 185 countries to keep global average temperatures "well below" 2°C above pre-industrial levels – with an intent to limit the temperature increase to 1.5°C. The Agreement binds the UK to a universal, legally binding global climate deal, due to enter into force in 2020.

Domestic context

In June 2019 a law was passed committing the UK to bringing greenhouse gas emissions to net zero by 2050, compared with the previous target of at least 80% reduction from 1990. With climate emergencies declared by Parliament and local councils, and given the urgency with which we must act to avoid catastrophic impacts, Friends of the Earth believes we can and must go further, with net zero achievable sooner than 2050 subject to a collective effort by government and other public bodies, industry, business and the wider population.

The Planning Act (2008) introduced a binding requirement for climate change mitigation and adaptation to be implemented via Local Plans:

“Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the Local Planning authority's area contribute to the mitigation of, and adaptation to, climate change.”

(Section 19(1A), Planning and Compulsory Purchase Act 2004, as amended by the Planning Act 2008).

There is thus a sound legislative basis for planning new development and infrastructure in ways needed to achieve compliance with UK and international climate targets. In addition to planning for renewable energy schemes and energy efficiency development, meeting the 2050 net zero target will require radical, far-reaching changes to the way we plan for transport, housing, leisure, commerce and industry, energy infrastructure, and minerals extraction over the coming decades.

National planning policy

The NPPF para 149 states:

“Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.”

While the NPPF provides some pointers on mitigating climate change, these need translating into tangible planning policies and measures at the local level if the UK is to meet commitments and achieve the zero carbon target. A starting point would be the inclusion of a policy, or policies, in the Local Plan which support, promote and prioritise zero carbon development and renewable energy infrastructure.

Local and strategic plan policy

Plan policies should be clear that the planning authority expects proposals (insofar as they are capable of doing so) to demonstrate how they will:

- support the transition to a low carbon future in a changing climate
- contribute to radical reductions in greenhouse gas emissions
- contribute towards/deliver renewable and low carbon energy and associated infrastructure
- reduce greenhouse gas emissions, such as through location, orientation and design, improve resilience and 'avoid increased vulnerability to the range of impacts arising from climate change'.

(NPPF, paras 148, 150)

Policies and measures to achieve CO₂ and greenhouse gas reductions should be evidence-based, taking into account local circumstances. For example, renewable and sustainable energy studies can identify and assess opportunities for carbon reduction. Data on CO₂ emissions by region and local authority is available [online](#).

For plan-making, planning officers and inspectors should be encouraged to consider the following questions:

- Has a greenhouse gas emission audit been completed to enable progress of the plan against CO₂ commitments to be measured?
- Is the Local Plan designed as a whole to achieve a net reduction in greenhouse gas emissions in line with the provisions of the UK 2050 net zero target and Climate Change Act?

Renewable energy generation

Plan policies should seek to increase the supply of renewable, low carbon energy and heat. The NPPF (para 151) states that plans should:

- a) provide a positive strategy for energy from these sources
- b) consider identifying suitable areas for renewable and low carbon energy sources
- c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems.

For the UK to meet international commitments and the zero carbon target, it's essential that planning authorities identify suitable opportunities for renewable and low carbon energy sources, carrying out or commissioning technical studies and identifying suitable sites in the Local Plan. Friends of the Earth does not believe NPPF requirements go far enough in light of the rapid scaling up of renewable energy capacity we need and the

crucial role of forward planning and Local Plans in facilitating this. A positive strategy is likely to require authorities to identify suitable areas for renewable energy generation, where there's scope to do so.

The NPPF is more favourably disposed towards some forms of renewable energy than others. Research carried out by Friends of the Earth and others suggests that the approach to planning for onshore wind energy is unhelpful. Some councils' plans identify "suitable areas" (referred to in NPPF para 151 above) for renewable generation while others don't. See reference section for further details.

Some authorities look to Neighbourhood Plans to identify sites to allocate for renewable energy. For example, Melton Local Plan (2018) policy EN10 "Energy Generation from Renewable and Low Carbon Sources" enables the delivery of wind turbines, solar farms and other types of renewable energy by identifying "suitable areas" for renewable energy. The policy allows for such areas to be either identified in Neighbourhood Plans **or** proposed within landscape areas that have a low or low/moderate sensitivity to change.

In terms of policies meeting the tests of "soundness", the [Sc19\(1A\) duty \(PCPA 2004 - as amended\)](#) allows for mitigation and adaptation policies to be delivered in a number of ways. A plan which omits to allocate sites or identify areas for standalone renewable energy generation would not necessarily be found "unsound", so long as renewable energy and climate change is addressed in some other way. This could be via a generic policy to guide decisions on renewables applications which come forward in future, and integration with other policies – eg, on housing, employment, flood risk and infrastructure – which may be an appropriate strategy for delivering these aims.

The best plans will positively encourage renewable energy installations that maximise efficiency and minimise environmental impacts, including standalone generation policies and site allocations. For example, Area Action Plans and site allocation policies for housing, mixed use or employment can also require provision to be made for renewable energy – either standalone or integrated as part of the development. Encourage your local planning authority to include such policies.

Both the UK zero carbon target and 15% EU Renewable Energy Directive target, together with local emissions data, are useful in justifying ambitious provision for renewable energy generation in Local Plans.

According to the Committee on Climate Change, the UK needs significant new renewable generation capacity to accommodate rapid uptake of electric vehicles and hybrid heat pumps (Net Zero Technical report, 2019). They note this could require, in the period up to 2035, up to 35 GW onshore wind, 45 GW offshore wind and 54 GW solar PV. It's therefore important that planning authorities and communities consider the potential for a significant scaling up of renewables in their area, from micro to large scale wind and solar power plant and plan accordingly.

Friends of the Earth recommends that all planning authorities undertake a study to comprehensively assess the potential for the deployment of renewable and low carbon technologies in their district/borough. This should include both commercial scale renewables and micro generation (including on-site and building-integrated renewables) and district heating. Study findings and evidence should directly inform Local Plan site allocations and policy.

Energy efficiency, sustainable design

Climate mitigation and adaptation policies can be delivered in a variety of ways. Not all areas have suitable land to host large-scale stand-alone renewable energy schemes, however renewable energy technologies can be incorporated as part of new development, for example, integrated within the built fabric (eg, solar pv or thermal) or onsite (eg, heat pumps and wind turbine(s)).

A stronger focus on the energy efficiency of new development is also needed by requiring schemes to meet higher design standards that exceed Part L of the Building Regulations, for example [Passivhaus](#) and non-residential schemes built to [BREEAM](#) or equivalent standards. Passivhaus design requirements include thicker, insulated walls, natural cooling, substitution of fossil fuel heating systems with geothermal or heat pumps, and insulated air-tight timber frame and brick cladding (a link to Passivhaus standards can be found in the reference section).

At the time of writing, planning authorities can set energy efficiency standards in their Local Plan that exceed Building Regulations (see Richmond on Thames policy example on page 36-37), and many do. It's unclear whether authorities will be able to continue to do so in future following government consultation on Part L ([Future Homes Standard](#) November 2019 to January 2020). This consultation sought views on a number of changes, including whether local authorities should be restricted in future from setting their own higher standards – in other words, restricting attempts by councils to be as sustainable as possible in their Local Plan. This proposal was met with strong opposition by Friends of the Earth and others in the environment and built environment sectors. The outcome to this consultation is expected sometime in 2020.

Given the emphasis put on housing delivery within the NPPF, some flexibility may be needed when proposing policies where evidence demonstrates that a lack of viability might make a policy hard to apply. However, there are examples of good practice which show what can be achieved. An example of where more enhanced efficiency standards might be compelling is where a site is in public ownership or where the local authority aims to develop their own housing as they will have more control over the development. A social housing provider may recognise the need to deliver homes for residents which are affordable to run (with low heating and water bills) and cheaper to maintain, and view the higher build cost as an investment which pays off over the long term, benefiting them and their tenants. Passivhaus principles have been successfully applied in private sector schemes too. Private sector developers benefit from building to higher standards

as this will enhance the quality of the housing making it more attractive to prospective purchasers and occupants who will benefit from lower bills.

**Case Study: Goldsmith Street, Norwich – Royal Institute of British Architects
Winning 'Passivhaus' housing**

A high density social housing scheme of 105 eco homes (56 one bed flats and a mix of two, three and four bedroom flats and houses) was delivered on a brownfield site in Norwich City Centre. It won the 2019 RIBA design award for outstanding architecture, mainly due to adherence to Passivhaus principles, but also by making exceptional use of space (ie, 85 dwellings per hectare) and making the focal point about liveable streets and neighbourhoods rather than car parking and roads (which were located to the outskirts of the site).

The scheme went above and beyond the requirements of site-specific policy R27 (Norwich Joint Core Strategy), where proposals:

- must achieve a minimum density of 40dp/h;
- must be designed to include a new pedestrian/cycle access, contribute to improved open spaces;
- must be in line with design guidance; and
- must have regard to minimising local impacts of surface water flooding.

Adaptation and resilient buildings

[Planning Practice Guidance](#) states that “the impact of climate change needs to be taken into account in a realistic way’ and that councils should ‘identify responses to climate risks that also deliver other benefits, such as green infrastructure that improves adaptation, biodiversity and amenity.” Large scale tree planting is cited as a low cost means to achieve these aims, as it cuts across all of these themes.

Building adaptation means future-proofing developments against rising temperatures, extreme weather patterns, flooding and sea-level rises (especially in low lying areas of the UK). Siting development away from flood plains or using natural cooling principles are a means of encouraging adaptation. Some adaptation principles are also included within the Passivhaus standard.

Friends of the Earth recommends the following policy approaches be incorporated into the Local Plan or, where applicable, Joint Strategic Plan (wording draws on actual or draft policies):

Sustainable Building

All development proposals will be expected to mitigate against and adapt to climate change, to comply with national and contribute to local targets on reducing carbon emissions and energy use unless it can be demonstrated that compliance with the policy is not viable or feasible.

[South Kesteven Local Plan](#), adopted February 2020, Policy SB1 (extract)

Renewable Energy Development

Proposals for the utilisation, distribution and development of new renewable energy capacity, including large-scale freestanding installations, will be encouraged. In assessing such proposals the environmental and economic benefits of the proposed development will be afforded significant weight alongside considerations of public health and safety and impacts on biodiversity, landscape character, the historic environment and the residential amenity of the surrounding area.

Bristol Local Plan Review, March 2019 Draft Policy CCS5

Energy Generation from Renewable and Low Carbon Sources

Renewable and low carbon energy proposals appropriate for Melton, including biomass power generation, combined heat and power (CHP), hydro, wind, solar and micro generation systems, will be supported and considered in the context of sustainable development and climate change. Proposals for renewable and low carbon energy technology, associated infrastructure and integration of renewable and low carbon technology on existing or proposed structures will be assessed both individually and cumulatively on their merits taking account of the following factors:

1. Siting, so as to gain maximum effect from wind/solar/water sources;
2. The surrounding landscape, townscape and heritage assets;
3. Residential and visual amenity;
4. Noise impacts;
5. Odour impacts;
6. Designated nature conservation, geo-diversity or biodiversity considerations, including potential impact on ancient woodland and veteran trees;
7. Ecology;
8. Aircraft movements and associated activities, including effects on radar, communications and navigational systems;
9. Electromagnetic transmissions;

10. High quality agricultural land;
11. Access for construction, maintenance and de-commissioning;
12. Not creating demand for bio-energy fuels known to result in net carbon emissions through production methods, transport requirements and/or loss of carbon sinks;
13. General safety in terms of highways, power lines, icing, visual distraction; and
14. Transport movements for importation of biomass fuel.

In the case of proposals for wind energy development involving one or more wind turbines, planning permission will only be granted if:

15. A bond is in place to cover de-commissioning; and
16. The development site is in an area identified as being suitable for wind turbine development in a Neighbourhood Plan*; or
17. The development site is in an area identified as being of low or low-moderate sensitivity to wind turbine development in the Council's Landscape Sensitivity Study 2014. These areas and acceptable turbine requirements are set out in the table below. The landscape character units are indicated on the Policies Map*; and
18. Following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing**.

[Melton Local Plan](#), adopted 2018, Policy EN10 (extract).

*/** these requirements do not apply to the repowering of existing wind farms of single turbines (as per para 154b NPPF).

Renewable and Low Carbon Energy Development

In assessing low carbon and renewable energy proposals, the Council will give positive weight to initiatives which are community-led or where there are direct benefits to the local community through their involvement.

Warrington proposed submission Local Plan 2019 Policy ENV7 (extract)

Sustainable Design and Construction

A. Developments will be required to achieve the highest standards of sustainable design and construction to mitigate the likely effects of climate change. Applicants will be required to complete the following:

1. Development of 1 dwelling unit or more, or 100 sqm or more of non-residential floor

space (including extensions) will be required to complete the Sustainable Construction Checklist SPD. A completed Checklist has to be submitted as part of the planning application.

2. Development that results in a new residential dwelling, including conversions, change of use, and extensions that result in a new dwelling unit, will be required to incorporate water conservation measures to achieve maximum water consumption of 110 litres per person per day for homes (including an allowance of 5 litres or less per person per day for external water consumption).

3. New non-residential buildings over 100 sqm will be required to meet BREEAM "Excellent" standard.

4. Proposals for change of use to residential will be required to meet BREEAM Domestic Refurbishment "Excellent" standard (where feasible).

Reducing Carbon Dioxide Emissions

B. Developers are required to incorporate measures to improve energy conservation and efficiency as well as contributions to renewable and low carbon energy generation. Proposed developments are required to meet the following minimum reductions in carbon dioxide emissions:

1. All new major residential developments (10 units or more) should achieve zero carbon standards in line with London Plan policy.

2. All other new residential buildings should achieve a 35% reduction.

3. All non-residential buildings over 100sqm should achieve a 35% reduction. From 2019 all major non-residential buildings should achieve zero carbon standards in line with London Plan policy.

Targets are expressed as a percentage improvement over the target emission rate (TER) based on Part L of the 2013 Building Regulations.

C. This should be achieved by following the Energy Hierarchy:

1. Be lean: use less energy

2. Be clean: supply energy efficiently

3. Be green: use renewable energy

[Richmond-upon-Thames Local Plan](#), adopted July 2018, Policy LP 22

Heat supply

Development proposals should include a communal low-temperature heating system where viable. The heat source for the communal heating system should be selected in

accordance with the following heating hierarchy:

1. connect to local existing or planned heat networks where these are low carbon
2. use of local ambient or secondary heat sources (in conjunction with heat pumps*, if required)
3. use of zero-carbon renewable heat or non-fossil fuel CHP**

*heat pumps assumed to become zero-carbon when grid decarbonises

** biomass use should be avoided in urban areas because of air pollution risks, and when used there must be a requirement to use locally produced and sustainably harvested biomass (for example, coppicing)

Where a local heat network is planned but not yet in existence or connection is not currently viable, but may become viable in the future, the development should be designed to allow for the cost-effective connection and supply at a later date. In this case the heat should be supplied according to steps 2 and 3 of the above hierarchy.

(Wording draws on Stroud District Local Plan Review, Draft Plan, November 2019, Delivery Policy DES3, with Friends of the Earth amendments.)

Adaptation to climate change

All developments will demonstrate how they have been designed to incorporate measures to adapt to climate change. The following measures shall be incorporated into all development:

- Wherever possible, new buildings shall be orientated to maximise the opportunities for both natural heating and ventilation and reducing exposure to wind and other elements;
- Proposals involving both new and existing buildings shall demonstrate how they have been designed to maximise resistance and resilience to climate change, for example by including measures such as solar shading, thermal mass, heating and ventilation of the building and appropriately coloured materials in areas exposed to direct sunlight, green and brown roofs, green walls, etc;
- Use of trees and other planting, where appropriate, as part of a landscape scheme to provide shading of amenity areas, buildings and streets and to help to connect habitat, designed with native plants that are carefully selected, managed and adaptable to meet the predicted changed climatic conditions; and
- All development shall minimise the impact of surface water runoff from the development in the design of the drainage system, and where possible incorporate mitigation and resilience measures for any increases in river flooding levels as a result of climate change.

[Reading Local Plan](#), adopted November 2019 Policy CC3

6. Unconventional oil and gas and coal extraction

Unconventional oil and gas extraction covers a number of disparate processes such as hydraulic fracturing, acidisation, coal-bed methane and coal gasification. Given the wide range of planning impacts that can arise from unconventional oil and gas extraction, such as landscape and visual, HGV traffic, air quality, amenity, 24-hour noise and lighting, biodiversity, not to mention climate change impacts, it's important to respond to consultations. This will help ensure planning policies for your area are robust, effective, and provide as much protection as possible.

The Infrastructure Act 2015 sets out planning responsibilities in relation to the environmental effects and cumulative impact of such developments. Planning policy doesn't cover all aspects of fracking. Other regulators such as the Environment Agency (EA), Health and Safety Executive (HSE) and Oil and Gas Authority (OGA) have oversight – among other matters – of environmental permitting (including groundwater and mining waste), well bore safety, and signing off Hydraulic Fracturing Consent (HFC). In November 2019 the government issued a moratorium against issuing any new fracking permits due to uncertainty regarding impacts.

Friends of the Earth has taken part in several mineral plan examinations over the past few years, including plans covering Cumbria, West Sussex, Cheshire West, North Yorkshire and East Riding of Yorkshire – where we have had a number of policy wins.

The following suggested policy wording incorporates approaches that have been successful at examination. Note that in some instances the wording does not go as far as we would like. Tackling climate change will require plans to set a presumption against shale gas development which at the present time government policy does not support.

Unconventional oil and gas

1. Exploration and appraisal of unconventional oil and gas utilising all forms of well stimulation will be considered against the following criteria:
 - a. Surface infrastructure is not within a protected area (including SSSIs, European Protected and Ramsar sites);
 - b. Surface and below ground infrastructure is located in the least sensitive location taking account of environmental, geological and technical factors;
 - c. Surface development situated at least 500m away from the nearest residential property or where robust evidence is submitted to justify being located within this distance;

- d. The proposal avoids harm to the environment or communities. Where harm is outweighed by the need for the development, the impacts on communities and the environment including (but not limited to) noise, dust, visual intrusion, transport, and lighting, air quality, induced seismicity, historic and built environment and the water environment can be minimised, and/or mitigated to an acceptable level;
 - e. No unacceptable impacts would arise from the on-site storage or treatment of hazardous substances and/or contaminated fluids above or below ground;
 - f. Hydraulic fracturing in Groundwater Source Protection Zones 2 and 3 is not be permitted unless it can be demonstrated there will be no unacceptable impacts on groundwater. Hydraulic fracturing will not be permitted above 1,200 metres in Groundwater Protection Zone 1;
 - g. Restoration and aftercare of the site to a high-quality standard would take place at the earliest opportunity whether or not oil or gas is found. The Mineral Planning Authority will require provision of a financial guarantee, appropriate to the scale, nature and location of the development proposed in order to ensure that the site is restored and left in a condition suitable for beneficial use following completion of the development; and
 - h. Proposals involving hydraulic fracturing should be accompanied by an air quality monitoring plan and Health Impact Assessment.
2. The commercial production of unconventional oil and gas (including all volumes of fracking activity) will be considered against the following criteria:
- a. proposals accord with (a-h) above;
 - b. no unacceptable impacts would arise from the transport, by vehicle or other means, of oil/gas, water, consumables, and wastes to or from the site;
 - c. schemes can demonstrate a net zero impact on climate change.

The NPPF does not recognise that continuing to plan for fossil fuel extraction conflicts with the planning system objective to achieve radical reductions in greenhouse gas emissions and deliver sustainable development. While the NPPF no longer allows “great weight” to be given to the benefits of coal in decisions, “great weight” can still apply to other types of minerals development, including fossil fuels. Yet it’s essential that planning gives priority to non-fossil fuel energy infrastructure. This is the approach adopted by Planning Policy Wales 10 which states:

“The Welsh Government has set challenging targets for decarbonisation and increased renewable energy generation. The continued extraction of all fossil fuels, including shale gas, coal bed methane and underground coal gasification, are not compatible with those targets. The Welsh Government’s policy objective is therefore to avoid the continued extraction and consumption of fossil fuels.

When proposing the extraction of on-shore oil and gas, robust and credible evidence will need to be provided to the effect that proposals conform to the energy hierarchy, including how they make a necessary contribution towards decarbonising the energy system. In all other respects, minerals policies aimed at preventing and limiting the environmental impacts of extraction and ensuring restoration will apply." (para 5.10.11)

Friends of the Earth believes that such an approach is equally relevant for England. However until the NPPF is updated to reflect measures needed to deliver zero carbon, it's unlikely that Local Plans will be able to fully embrace the Welsh approach. We recommend that consideration be given to taking a similar approach for plans in England as far as practicable within the constraints of government policy. Such an approach will need to be backed up by evidence (justified) in order to succeed.

In light of the UK government's commitment to phase out unabated coal by 2025, we think that it's appropriate to introduce a general presumption against new open cast coal mining.

Friends of the Earth commends the policy on coal set out in Planning Policy Wales 10 (2018) which reads:

"Proposals for opencast, deep-mine development or colliery spoil disposal should not be permitted.

Should, in wholly exceptional circumstances, proposals be put forward they would clearly need to demonstrate why they are needed in the context of climate change emissions reductions targets and for reasons of national energy security."

Planning Policy Wales 10 (2018), para 5.10.14

In the context of binding climate change targets and coal phase out (for unabated coal scheduled for 2025 in the UK) this policy approach is in our view equally applicable to England. NPPF para 204 advises that planning policies should provide for the extraction of mineral resources of local and national importance. As stated above, it also makes clear that the great weight that should apply to minerals extraction in deciding whether to allow proposals does not apply to coal.

While the NPPF wording doesn't explicitly preclude the Welsh approach, it doesn't endorse it either. Inspectors and planners may err on the side of caution and view a presumption against coal as non-compliant. Were this policy adopted by English local authorities, it would nonetheless reflect the NPPF requirement to plan for radical reductions in greenhouse gas emissions (para 149) and this argument should be used to justify use of such a policy in England, backed up by local evidence where possible.

7. Housing

Housing is of pre-eminent importance in the NPPF. Unhelpfully, this places an overriding emphasis on housing numbers at the expense of quality, sustainability and affordability. The NPPF requires local planning authorities to plan to meet "objectively assessed needs" and allocate land accordingly. Authorities may plan for more homes than this, but not less. They must follow a formula set by government to calculate their housing requirements. Where they are unable to allocate enough land to meet their housing requirement, they must work with other authorities to identify sufficient land within the wider housing market area.

Whatever the shortcomings of the methodology planning authorities must use to derive a housing target – and there are plenty – it's important to question whether targets are realistic, sustainable and deliverable. The quality, affordability and location of new housing are key consideration.

The NPPF defines affordable housing in a broad way to include affordable homes for rent (which must be at least 20% below market value), discounted market sales housing, "Starter Homes" and shared ownership. None of these definitions guarantees homes delivered will be affordable to those on low incomes. Moreover, to be affordable, Friends of the Earth believes a home should also be affordable to run – with minimal energy, maintenance and transport costs, which rules out locations with poor or no access to facilities – and achieve high standards of energy efficiency.

Friends of the Earth believes that new housing development should be based on principles of:

- **Social Equity.** Access to good housing is a basic human right (by delivering social housing in response to 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.
- **Sustainable Location.** Developing in places with good access to public transport, jobs and services, including green space, with an emphasis on re-using buildings and previously developed land.
- **Urban Capacity:** By a greater sensitivity of the social and environmental capacity of existing communities to accommodate new housing and to the housing needs of those communities.
- **Design Innovation.** By promoting innovation and high sustainability standards in housing design, construction and layout, taking into account climate change mitigation and adaptation.
- **Participative Processes.** The views of local people underpin the local approach to planning for housing.

The NPPF is clear that “permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents” (para 130).

Housing land provision

Friends of the Earth strongly supports the use of a sequential approach to the provision of new housing land. This approach prioritises re-development of previously developed land and converting and re-using buildings (NPPF, paras 117, 118) in preference to developing greenfield sites. Alongside this, we advocate the use of phasing to ensure that land allocated for development is proactively brought forward at a rate which encourages the re-use of urban land, except where this land is of high environmental value, and an important green or public space which should be protected.

The NPPF states that policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or brownfield land (para 117).

Friends of the Earth recommends a proactive policy stance to secure the re-use of vacant and under-utilised properties, refurbishment of existing properties and the promotion of “homes above shops” as part of a comprehensive package of measures to revitalise urban areas, town centres and neighbourhoods.

Brownfield land register and permission in principle

The Housing and Planning Act 2016 introduced a requirement for local authorities to prepare a brownfield land register. The purpose of the register is to set out information on sites which may be suitable for housing and sites given planning “permission in principle” (PiP). Part II of the register deals with sites that have been given PiP.

Under PiP the location, use and amount of residential development is agreed for a site, while other details are left to be decided at a later stage. Although in some ways PiP is similar to local development orders (which have existed for some years), it represents another means whereby government has sought to “speed up” planning. As yet, few part 2 brownfield land registers (the part of the register which confers PiP) have been produced. Local authorities have for the most part prepared part 1, which identifies brownfield sites which may be suitable for housing.

Friends of the Earth re-emphasises that the point of the planning system is to safeguard communities and the natural environment from ill-conceived development. Applications for housing should have to undergo rigorous design, sustainability and environmental screening as part of the normal planning application process. Friends of the Earth therefore does not support PiP, since this enables proposals to by-pass the scrutiny of the planning application process, such as the conversion of offices to residential under permitted development which has led to poor planning outcomes in some areas. We

believe planning authorities should be trusted to deliver high quality, sustainable housing schemes without the need for a blanket approval approach to deliver development.

Housing density

The density of development refers to how many homes a given area can accommodate, and is sometimes measured in terms of the number of habitable rooms or dwellings per hectare (dph). Friends of the Earth supports the need for increased densities in accessible locations well served by walking, cycling and public transport. Increasing density should not be at the expense of accessible green space.

High density does not equate to high rise or town cramming – there are good examples of mid-rise and even low-rise schemes which achieve high densities. Care should be taken to reduce hardstanding and the dominance of the road in new development. What is the “right” density will vary from place to place, but in general minimum housing densities (in accessible locations) should be around 100 dwellings per hectare (higher in urban centres), with clear design principles adopted to ensure housing quality, character, mix and sense of place are protected and enhanced. In reaching a view on what works for a particular site or location, the following should be taken into account:

- how accessible a location is
- proximity to local services and facilities
- access to employment and recreation
- provision for walking, cycling and public transport.

The NPPF advises that planning policies should support development that makes efficient use of land (para 122), minimum density standards and higher densities in town and city centres (para 123).

Friends of the Earth recommends that minimum acceptable density levels be specified in Local Plans, alongside minimum provision for publicly accessible green space.

Low impact housing

Local Plan policy should encourage innovative housing design and construction methods which combine elements of traditional building techniques with sustainable building materials, energy conservation and water and refuse recycling. The highest possible standards should be set for housing developments, while low-impact development should be encouraged on a self-build basis and specific policies set out to encourage such schemes to come forward.

Affordable housing

Housing equity is a vital part of the sustainable development of an area. As well as

increasing the supply of affordable homes, plan policies should seek to secure a range of size, types and tenures of housing so as to ensure a greater level of equity in housing provision than currently exists. The Local Plan should set a target for at least 30% of all new homes to be affordable – more where a need is demonstrated. The right target will depend on local circumstances and should be backed up by evidence to survive the tests of soundness and viability.

Affordable housing has traditionally been delivered in the form of social rented housing, discounted rent, discount-for-sale and shared equity schemes. Friends of the Earth believes that developers should therefore continue to deliver a mix of affordable housing tenures, including those that are affordable to either prospective renters or aspiring owner-occupiers.

8. Transport

Rising traffic levels are causing major environmental, economic and social problems throughout the country. Friends of the Earth believes that the only way to tackle all the problems caused by the way we currently travel is to reduce the volume of traffic on our roads. Local Transport Plans are key for local authorities as they in turn influence the Local Plan (eg, supported road schemes will have to be included in the Local Plan).

As well as planning for sustainable infrastructure and transport, where we plan or allow new development is also key. The NPPF advises that “significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes” (para 103).

Local Plans should include transport policies on the following topics:

- Demand management measures (for example, reduced car parking in town and city centre locations)
- Parking charges (making use of the powers provided by the Transport Act 2000) and maximum standards (NPPF, paras 105-106)
- Land use, climate change and transport integration
- Hierarchy of transport users (usually from the most to least sustainable uses)
- Soft measures and road safety
- Electric charging facilities
- Airports (including surface access schemes)
- Road-building (to be regarded as the option of last resort)
- Rail schemes
- Buses (seeking to increase bus patronage by safeguarding routes and accessibility)

- Cycling
- Walking.

Hierarchy of transport use

Establishing a hierarchy of transport use should be integrated into Local Transport Plans and Local Plans.

Friends of the Earth recommends the following policy for Local Transport Plans:

The plan will consider and provide for the needs of different modes of transport in accordance with the following hierarchy of transport users:

1. pedestrians
2. the mobility-impaired
3. cyclists (including electric cycles)
4. public transport users
5. powered two-wheelers
6. commercial users
7. shoppers and visitors by car
8. car commuters

Land use, climate change and transport integration

Transport policies have wide-ranging impacts on land use and climate change, so it's important that these work to the benefit of communities and the environment.

Transport is currently the worst performing sector for carbon reduction in the UK. While emissions from all other sectors (and the UK as a whole) since 1990 have fallen, total transport emissions (including IAS) have increased.

In order to mitigate the climate change consequences of transport activity and proposals, local authorities should:

- implement policies which will reduce forecast growth in greenhouse gas and other emissions from existing transport activity by less sustainable modes (road and air), and
- undertake and then act on climate change impact appraisals of significant new transport proposals and programme (Travel Plans, Transport Statements and Transport Assessments).

Local authorities should minimise the resource demands of transport by:

- Integrating land use and transport so as to reduce the need and demand for travel, focusing major new developments around public transport hubs **or** linking new developments to major new sustainable transport infrastructure and proposals, being mindful of sufficient critical mass of users to make new infrastructure viable.
- Requiring all new major developments to provide Travel Plans to demonstrate how they will facilitate a shift to sustainable modes of transport for users.
- Restricting provision for individual car travel in locations with good quality public transport and local facilities, by setting maximum parking standards and encouraging car-free (with the exception of essential and emergency services and disabled users) and car share only development schemes.

This approach is broadly in line with the NPPF para 104 which states that planning policies should:

- a) Support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;
- b) be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;
- c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;
- d) provide for high quality walking and cycling networks and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans).

The NPPF advises that Local Plan policy will need to provide for any large scale transport proposals that are being planned (para 104e) and “recognise the importance of maintaining a national network of general aviation airfields” (para 104f). So while you’re free to object to these aspects of the Local Plan, your council won’t be able to ignore these requirements. We suggest you call for those less sustainable aspects to be reassessed in light of point b above – “strategies and investments for supporting sustainable transport and development patterns are aligned”, and in light of carbon reduction commitments at national and, if applicable, local level.

Cars and Roads

Road-building provides neither a medium nor long-term solution to traffic problems. The government has accepted that we cannot build our way out of congestion. However, efforts to promote modal shifts away from the car have so far met with partial success, as much new development still has minimum parking standards (ie, “enough” car parking spaces for its users) indicating a continued reliance on car-based transport modes. This is despite increased air pollution, congestion of the existing road network and loss of land that might be used for other purposes. The result is that new road capacity is often viewed as the only option to overcome congestion when, with good planning, the situation (traffic growth) could have been avoided in the first place

One helpful approach the NPPF allows is for local authorities to set maximum parking standards – where justified and necessary for managing the local road network – or for optimising the density of development in city and town centres and other locations well served by public transport (para 105).

Friends of the Earth recommends the following policy:

Road-building will be regarded as the option of last resort as a means to address transport problems. Support will not be given to any road-building proposal unless it can be demonstrated that all other possible alternatives, including non-road-building options and making more efficient use of existing infrastructure, have been fully considered and evidence demonstrates that these do not provide an adequate solution.

For further ideas read “Planning for less car use” (Transport for Quality of Life, Friends of the Earth, 2019) (see reading section below).

Active Travel

There is growing recognition of the health benefits of Active Travel and the role of planning in facilitating this through the creation of walking and cycling-friendly neighbourhoods. According to the National Institute for Health and Care Excellence, physical inactivity is responsible for one in six deaths and costs the UK an estimated £7.4 billion per year, including £900 million to the NHS ([NICE News Release, January 2019](#)). People who walk or cycle have a lower risk of premature mortality, as walking and cycling reduce the risk of cardiovascular disease, respiratory disease, some cancers and Type II diabetes and enhance mental as well as physical well-being.

Walking

Walking is a healthy, sustainable mode of transport that plays a key role for short journeys. A quarter of all journeys are under a mile long, and thus can be walked by most people. In April 2017, and as required by the Infrastructure Act 2015, government published a Cycling and Walking Investment Strategy (CWIS) for England with the aim of reversing the decline in walking and doubling the number of cycling trips.

Friends of the Earth recommends the following policy on walking:

The Council recognises the potential for significant modal shift to walking for short journeys and will aim by the end of the plan period to increase substantially the frequency of journeys under one mile long made on foot. This will be achieved by:

- providing direct, well-maintained, and well-lit walking routes, including to and from schools
- providing quality footways in towns and cities and Quiet Lanes in rural areas
- slowing down traffic with 20mph zones and Home Zones
- Improving walking related infrastructure
- designing infrastructure to meet the needs of different groups including older people, disabled people, and children.

Cycling

Cycling is seen as a minority mode of transport in the UK, but 25% of all journeys are under a mile long and 68% under five miles (National Travel Survey, 2018), and therefore able to be cycled by most people. Longer journeys are amenable to travel by electric bike. The CWIS (cited above) promotes the wider benefits of cycling, and government aims to support initiatives to encourage cycling and walking at national and local scales, including multi-use paths, better promotion of cycleways and footpaths within new developments, and promotion of the benefits of cycling and walking in schools. Strategic Plans, such as the Greater Manchester Spatial Framework, include policies to promote new cycling infrastructure as do most Local Plans.

Friends of the Earth recommends the following policy on cycling:

The Local Plan recognises the potential for a significant modal shift to cycling for short and medium journeys and aims, as a minimum, to [insert rate of increase*] the frequency of journeys made by bike by the end of the plan period. This will be achieved by providing a comprehensive network of cycle-friendly streets, multi-use paths and cycle routes in both urban and rural areas.

* Use the [Propensity to Cycle Tool](#) to find out the potential for cycling to grow in your area.

9. Natural Environment

Friends of the Earth is deeply concerned that the emphasis on growth and housing delivery in the NPPF will allow for the intrinsic value of the natural environment to be crudely traded off against short-term housing targets and economic objectives.

The "[Making Space for Nature](#)" review chaired by Professor Sir John Lawton found nature to be highly fragmented and vulnerable to pressure, and advised government to create a more resilient ecological network across England. The Lawton review also recognised the vital importance of natural areas to continued food security (including supporting pollinators) and the role of natural areas in flood defence and climate regulation. The government has taken forward some of the Lawson review recommendations in both the Environment White Paper (2011) and the 25 Year Environment Plan (2018). The latter proposes measures to:

- strengthen requirements for net gain for biodiversity in national planning policy
- standards for green infrastructure
- the embedding of an environmental net gain principle for development and
- the setting up of Nature Recovery Networks.

These are generally helpful with the exception of the net gain approach, which raises concerns. In our view, the net gain approach is an unproven way of protecting existing nature and ecosystems and of creating new natural or semi natural places and conditions, given the lack of local authority skills and competence and the weight given to development. Despite being reflected in a revised NPPF, there's still a lack of clarity as to how biodiversity net gain should work in practice and whether it will truly help restore the state of wild species, habitats and ecosystems.

There's good evidence that natural spaces (Green Infrastructure) benefit people by promoting health and wellbeing and reducing crime. Such evidence led the Natural Capital Committee, set up by the government in 2011, to advise that the decline in natural capital has significant costs for our health, wellbeing and the economy (see The State of Natural Capital annual reports).

The NPPF (para 170) advises that planning policies should contribute to and enhance the natural and local environment including by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- b) recognising ... the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and

future pressures;

e) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Planning policy has a crucial role to play in protecting biodiversity and habitats, creating new habitats, enhancing existing ones and supporting nature's restoration and recovery. To protect and enhance biodiversity and geodiversity, the NPPF para 174 says plans should:

- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation, and
- b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

As per NPPF para 171, plans should also:

- distinguish between the hierarchy of international, national and locally designated sites;
- allocate land with the least environmental or amenity value;
- take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure;
- and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

Friends of the Earth recommends the following approach in Local Plans:

Local authorities should identify all sites of importance to biodiversity in their plan areas. Designated sites and other habitats of local importance should be shown on the Policies Map.

Local authorities should proactively promote biodiversity through the Local Plan so that it is within this context that development is brought forward.

Local authorities should reject biodiversity offsetting and biodiversity net gain unless it is clearly demonstrated that the mitigation hierarchy has been strictly followed, all other

options have been considered and found to be unfeasible and impacts are considered acceptable.

We recommend that Local Plan policies include the following:

- Set out an overarching commitment to support nature's restoration and recovery, (linked to policies on development management, sustainable design, site allocations, green infrastructure and implementation/developer contributions).
- Require development proposals to deliver a net gain for biodiversity (to establish, support and sustain coherent ecological networks that are resilient to current and future pressures).
- Require the creation of biodiversity spaces and features in and around new developments appropriate to the scale of the development (alongside the requirements for good design in the NPPF). For example, this might include new green spaces, green roofs or roosting or nesting provision on built structures.
- Protect existing sites of biodiversity importance, their nature features and conditions on site (designated and undesignated).
- Set out local standards for accessible green space provision at least equivalent to Natural England Accessible Natural Greenspace Standards (see useful websites section below).
- Recognise the benefits of urban habitats and their role in supporting a large, diverse , variety of wild species, plants, fungi, insects, birds, amphibians, mammals, for example, and communities of bees and other insects that play an important role in pollinating urban and peri urban crops, especially gardens and allotments and requiring new development and infrastructure, as well as conservation strategies, to take this into account.
- Commit to protect, enhance and improve access to green space, whether formally designated as such or not in recognition of the multiple benefits of these bring: whether for recreation, flood mitigation, wildlife habitat, carbon sequestration and, amenity.
- Require green space to be provided with all new housing and mixed-use development. Where residential gardens are at risk of being lost to development.

For more guidance on natural spaces and best practice in local planning see [“Planning for a healthy environment: good practice guidance for green infrastructure and biodiversity”](#) (TCPA and Wildlife Trusts, 2012). Key issues in implementing policy to protect and enhance the natural environment, including local requirements are explained in [Planning Practice Guidance](#).

Friends of the Earth recommends the following policy on biodiversity:

Development is required to safeguard biodiversity by ensuring that:

- Development is not permitted where it would harm internationally, nationally, regionally, or locally designated nature conservation sites.
- Development is not permitted where it would harm species which are legally protected, or identified as in decline or rare.
- The movement of wildlife through wildlife corridors identified in the plan is not impeded by development.

All development proposals must be based on ecological assessments, appropriate to the scale of the development, with surveys undertaken at appropriate times of year for the relevant habitats, species, flora and fauna.

All development should positively contribute to biodiversity gain, restored ecosystems and people's access to nature by contributing new habitat features commensurate with the scale of development.

The following is a good example of a policy on biodiversity and green infrastructure

Delivering green infrastructure and biodiversity in development

1. All development is required to protect and enhance both biodiversity and green infrastructure features and networks both on and off-site for the lifetime of the development.

2. Developments proposals are required to evidence a thorough understanding of context through the preparation of a proportionate assessment of existing and planned green infrastructure, biodiversity and ecological features and networks both on the site and in the locality, and demonstrate how:

a) Through physical alterations and a management plan for the lifetime of the development:

i. Existing green infrastructure and biodiversity assets will be maximised;

ii. Opportunities to enhance existing and provide new green infrastructure and biodiversity assets will be maximised;

iii. Development will deliver long lasting measurable net gains in biodiversity;

iv. Where appropriate, a monitoring plan will be put in place to review delivery of i -iii.

b) The mitigation hierarchy has been applied by following a sequential approach to avoid, minimise, mitigate, and finally compensate for (on then off-site) any harm to biodiversity. If significant harm cannot be avoided in this way, development will not be permitted.

[Wycombe Local Plan](#) (adopted 2019) policy DM34 (extract).

Trees and Woodland

There is much that your Local Plan can do to help protect trees and woodland and facilitate new provision. Policies should cover the protection of existing trees and woodland and circumstances where provision for new trees should be made. The Local Plan policies map should show areas of protected woodland. Plan policies should reflect relevant tree, forest or woodland strategies that exist in your area, including proposals to increase tree cover. Where a site is designated for woodland creation this should also be shown on the policies map. If you are aware of proposals to create woodland locally, request that these be shown on the policies map and land designated via a suitable policy.

Wycombe Local Plan (2019) policy DM34 seeks to “achieve a future canopy cover of 25% of the site area on sites outside of the town centres and 0.5ha or more. This will principally be achieved through retention and planting of trees, but where it can be demonstrated that this is impractical the use of other green infrastructure (e.g. green roofs and walls) can be used to deliver equivalent benefit.”

The following draft policy sets criteria to guide decisions which new development is expected to meet:

Trees, hedgerows and woodlands

Development should seek to enhance and expand the district's tree and woodland resource, including native black poplars.

Where trees within or adjacent to a site could be affected by development, a full tree survey and arboricultural impact assessment to BS 5837 (as replaced) will be required as part of the planning application. The implementation of any protective measures it identifies will be secured by the use of planning conditions.

Development that would lead to an individual or cumulative significant adverse impact on ancient woodland or ancient trees will be refused unless exceptional circumstances can be demonstrated that the impacts to the site are clearly outweighed by the benefits of the development.

Development that would result in the unacceptable loss of, or damage to, or threaten the continued well-being of any trees, hedgerows, community orchards, veteran trees or woodland which make an important contribution to the character and amenities of the area will be resisted. Where the loss of trees is considered acceptable, adequate replacement provision will be required that use species that are in sympathy with the character of the existing tree species in the locality and the site.

Where species-rich native hedgerow (as commonly found on agricultural land) loss is unavoidable the developer must compensate for this loss by planting native species-rich hedgerow, which should result in a net gain of native hedgerow on the development site.

Developers should aspire to retain a 10 m (with a minimum of 5 m) natural buffer around retained and planted native hedgerows (100 m with a minimum 25 m natural buffer around woodlands) for the benefit of wildlife, incorporating a dark corridor with no lighting.

Development must provide buffers to Ancient Woodland and should provide additional planting to join up fragmented areas of woodland as part of the development's GI. Buffers should allow the maximum space proportionate to the development and would generally be expected to be a minimum of 50 m between the ancient woodland and any built development or grey infrastructure. Within the buffer, native trees may be planted along with other ecology features to secure net gains in biodiversity and/or landscape mitigation unless the achievement of this would be contrary to other policies in the plan.

Aylesbury Vale draft Local Plan, main modifications, November 2019, Policy NE9.

The following is a good example of a policy allocating land for the purposes of creating a community woodland.

Former Priorswood Landfill

A site of 16 hectares at the former Priorswood landfill site, as indicated on the Policies Map, is allocated for community woodland or other appropriate recreational uses.

Source: Taunton Deane Site Allocations and Development Management Plan, adopted 2016, Policy TAU11

Glossary of planning terms

Affordable housing: includes social rented, intermediate and low cost market housing provided to specified eligible households whose needs are not met by the market.

Area Action Plan: A plan for a specific area where significant change or conservation is needed.

Article 4 Direction: A direction which can be made by the Council to remove permitted development rights.

Brownfield land: Previously developed land which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure.

BREEAM: Building Research Establishment Environmental Assessment Method), first published by the Building Research Establishment (BRE) in 1990, is a well established method of assessing, rating, and certifying the sustainability of buildings.

Climate change adaptation: Adjustments made to natural or human systems in response to the actual or anticipated impacts of climate change, to mitigate harm or exploit beneficial opportunities.

Climate change mitigation: achieved by limiting or preventing greenhouse gas emissions and by enhancing activities that remove these gases from the atmosphere (IPCC definition).

Circular economy: An economic model which keeps resources in use for as long as possible at their highest level in order to maximise value and reduce waste, moving away from the traditional linear model of “make, use, dispose” to one based more around “reduce, re-use and recycle.” Applied to development, circular economy principles would cover aspects such as designing buildings for flexible use and reuse; modular construction of building components; designing for building disassembly and reuse; and looking to re-use and repurpose buildings in preference to demolition.

Decentralised energy: Local renewable energy and local low-carbon energy encompassing a diverse range of technologies.

Density: in residential development, a measurement of either the number of habitable rooms per hectare or number of dwellings per hectare. For other uses, such as commercial or employment, density can be expressed in terms of the amount of floorspace provided per hectare.

Development Plan: The statutory development plan is the starting point for the consideration of planning applications for development or use of land. It comprises the

Local Plan together with any Neighbourhood Plans, Strategic Plans and Spatial Development Plans prepared for the area.

Development Plan Document: The local planning documents which make up the Local Plan.

Green Belt: A designation for land around certain cities and large built-up areas, which aims to keep land permanently open or largely undeveloped.

Local Development Scheme: A document which sets out the timetable for the Local Plan and related documents that the Council intends to produce

Local Plan: sets out planning policies in a local authority area and allocates land for development. The Local Plan is used to guide planning decisions.

Local Plan Examination: Formal examination of the Local Plan and supporting documents by an inspector appointed by the Secretary of State to consider if the plan is sound and legally compliant.

Local Transport Plan: The Transport Act 2000 requires all highway authorities to produce a Local Transport Plan (LTP) which sets out a strategy and action plan for improving local transport. Outside the national government, highway authorities are the top-tier local authorities such as county councils, metropolitan boroughs, or unitary authorities. Some combined authorities are also producing a Local Transport Plan.

Minerals Local Plan: sets out planning policies for the control of development constituting the winning and working of minerals or the deposit of mineral waste.

National Planning Policy Framework: sets out planning policy for England.

Neighbourhood Plan: A plan prepared by a Parish Council or neighbourhood forum for a particular neighbourhood area. It must be consistent with the strategic policies in the Local Plan.

Policies Map: A map on an Ordnance Survey base, illustrating Local Plan policies and proposals and defining sites for particular developments or land uses and areas to which specified development management policies apply.

Sequential approach/ Sequential test: A planning principle whereby certain types or locations of land should be considered and developed before others. For example, prioritising development of brownfield housing sites over greenfield and town centre retail in preference to out-of-centre locations. The sequential test aims to steer new development to areas with the lowest risk of flooding.

Statement of Community Involvement (SCI): the Council's statement on how the local community, individuals and bodies will be involved in preparing the Local Plan and the consideration of planning applications.

Supplementary Planning Documents (SPDs): Produced by Councils, these provide further detail on policies within a Development Plan. SPDs are also used to give guidance on particular issues, including design, and can be considered as part of the application process.

Waste Local Plan: sets out planning policies in relation to waste management and related developments.

Further information and guidance

Friends of the Earth England Wales and Northern Ireland
The Printworks
139 Clapham Road
London SW9 0HP
Website: friendsoftheearth.uk
(Tel: 020 7490 1555)

Specific reading

Community Rights Resource Pack - This online resource contains the individual guides referred to above.

<https://friendsoftheearth.uk/legal-and-planning/guide-community-rights-environment-and-planning-law>

Planning Policy

National Planning Policy Framework, February 2019

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

National Planning Policy for Waste October 2014

<https://www.gov.uk/government/publications/national-planning-policy-for-waste>

Guidance

Accessible Natural Greenspace guidelines

<https://webarchive.nationalarchives.gov.uk/20140605145320/http://publications.naturalengland.org.uk/publication/40004?category=47004>

Brownfield land registers: <https://www.gov.uk/guidance/brownfield-land-registers>

<https://www.gov.uk/government/publications/brownfield-registers-and-permission-in-principle/brownfield-registers-and-permission-in-principle-frequently-asked-questions>

Living with beauty: Promoting health, well-being and sustainable growth, report of the Building Better, Building Beautiful Commission, January 2020.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/861832/Living_with_beauty_BBBC_report.pdf

Local Plans guide

https://www.planningportal.co.uk/info/200127/planning/102/about_the_planning_system/3

Planning Practice Guidance: <http://planningguidance.communities.gov.uk/>

<https://www.gov.uk/guidance/plan-making>

Procedure guide for Local Plan examinations, Planning Inspectorate, June 2019

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/813316/Procedure Guide for Local Plan Examinations June 2019 -
_Final.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/813316/Procedure_Guide_for_Local_Plan_Examinations_June_2019_-_Final.pdf)

Neighbourhood Planning

<https://neighbourhoodplanning.org/toolkits-and-guidance/create-neighbourhood-plan-step-by-step-roadmap-guide/>

<http://planningguidance.communities.gov.uk/blog/guidance/neighbourhood-planning/>

<https://www.gov.uk/government/collections/notes-on-neighbourhood-planning>

<https://www.gov.uk/guidance/neighbourhood-planning--2>

Neighbourhood Planning for the Environment, Environment Agency, Forestry Commission, Historic England and Natural England (2018)

<https://neighbourhoodplanning.org/wp-content/uploads/Environment-Toolkit-20181220.pdf>

Useful websites

Government departments, agencies and public bodies

Air quality site maintained by DEFRA: www.airquality.co.uk

Committee on Climate Change: <https://www.theccc.org.uk/>

Department for Business, Energy & Industrial Strategy (BEIS): www.beis.gov.uk

Department for Environment, Food and Rural Affairs (DEFRA): www.defra.gov.uk

Environment Agency: www.environment-agency.gov.uk/

Environment Agency Public Registers: <https://environment.data.gov.uk/public-register/view/index>

Historic England: <https://historicengland.org.uk/>

Information Commissioners Office: <https://ico.org.uk/>

Ministry of Housing, Communities and Local Government: www.mhclg.gov.uk

Neighbourhood Statistics (Office for National Statistics):
www.neighbourhood.statistics.gov.uk

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

Planning Portal: www.planningportal.co.uk

Non-Governmental Organisations (NGOs)

Environmental Law Foundation: www.elflaw.org/

Liberty: www.liberty-human-rights.org.uk/

Wildlife and Countryside Link: www.wcl.org.uk

Organisations who provide planning advice

Royal Town Planning Institute – Planning Aid: <http://www.rtpi.org.uk/planning-aid/>

The Prince's Foundation for Building Community: <http://www.princes-foundation.org/>

Locality: <http://locality.org.uk/projects/building-community/>

<https://neighbourhoodplanning.org/>

CPRE – the Countryside Charity planning site: www.planninghelp.org.uk

Useful References

Biodiversity offsetting and net gain: licence to trash nature?

<https://friendsoftheearth.uk/nature/biodiversity-offsetting-and-net-gain-licence-trash-nature>

The institutional and regulatory framework for biodiversity net gain (WCL, October 2019)

https://www.wcl.org.uk/docs/Link_net_gain_institutional_framework_paper_October_FINAL.pdf

<https://www.wildlifetrusts.org/habitats>

EU Renewable Energy Directive targets: UK and EU-wide progress

<https://ec.europa.eu/energy/en/topics/renewable-energy/progress-reports>

<https://eur-lex.europa.eu/legal->

[content/EN/TXT/PDF/?uri=CELEX:52019DC0225&qid=1559033163855&from=EN](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52019DC0225&qid=1559033163855&from=EN)

Rising to the Climate Crisis, guide for local authorities on planning for climate change, TCPA, RTPI (2018)

<https://www.rtpi.org.uk/practice/2019/september/rising-to-the-climate-crisis-a-guide-for-local-authorities-on-planning-for-climate-change/>

Onshore wind

<https://policy.friendsoftheearth.uk/reports/onshore-wind-its-delivery-being-hampered-lack-identified-areas-local-plans>

Devolution deals: www.local.gov.uk/topics/devolution/devolution-register

CPRE research report What's the Plan (2020), looks at Local Plan coverage in England
<https://www.cpre.org.uk/resources/whats-the-plan>

Sustainable design

<https://www.bregroup.com/a-z/the-passivhaus-standard/>

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/843468/National_Design_Guide.pdf

Transport: <https://policy.friendsoftheearth.uk/insight/planning-less-car-use>

Supplementary Planning Guidance

Leeds SPDs

<https://www.leeds.gov.uk/planning/planning-policy/supplementary-planning-documents-and-guidance/adopted-supplementary-planning-documents>

Air Quality SPD

<https://www.camden.gov.uk/web/guest/camden-planning-guidance>

Good practice examples

Locally distinctive approach: Breckland Local Plan (Adopted 2019) Policy GEN 01 Sustainable Development in Breckland, page 12

https://www.breckland.gov.uk/media/14806/Appendix-4-Breckland-District-Council-Local-Plan-text/pdf/Appendix_4_-_Breckland_District_Council_Local_Plan_text.pdf

Kensington & Chelsea Local Plan includes strategic objective respecting environmental limits

[https://www.rbkc.gov.uk/sites/default/files/atoms/files/Local_plan_2019_\(full_document\).pdf](https://www.rbkc.gov.uk/sites/default/files/atoms/files/Local_plan_2019_(full_document).pdf)

Melton Local Plan – Identifying suitable areas for wind turbines

<https://www.meltonplan.co.uk/adoptedplan>

Passivhaus: Goldsmith Street, Norwich: RIBA Winning council housing built to Passivhaus standards

<https://www.architecture.com/awards-and-competitions-landing-page/awards/riba-regional-awards/riba-east-award-winners/2019/goldsmith-street>

Plymouth and South Hams policy Derriford Community Park Strategic Greenspace seeks to deliver accessible natural green space, landscape scale restoration of wildlife habitats, the continuation of farming in the city, community food growing and provide for outdoor learning and social enterprise. See Policy PLY41, page 133.

<https://southhams.gov.uk/jointlocalplan>

Stroud District Renewable Energy Resources Assessment 2019, LUC and Centre for Sustainable Energy.

<https://www.cse.org.uk/downloads/reports-and-publications/planning/renewables/stroud-renewable-energy-assessment-2019.pdf>