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The planning balance in the 1990s: striking the balance between economic forces and environmental constraints

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***J.P.L. 43** Striking the balance between economic forces and environmental constraints is surely the foundation upon which the planning system was built, indeed one might say it was to obtain such a balance the planning system was built.

So what is new!

What is new are the indications that a new balance is being, and will be, struck in the 1990s. Questions inevitably arise; where will the balance be struck, what will turn out to be the predominant influence in determining the balance, when struck will it be sustainable and will it be uniform across the regions with their different aspirations? Also the question arises of whether the same balance will, or should, be struck in different regions. The questions are many and I have attempted to answer some. In the 1990s by regions we have of course to mean regions of Europe and not just the United Kingdom regions.

The Green Party may not yet be a political force to deal with, except perhaps in Germany, but the "green" in the other political parties certainly is. As all planning practitioners, whether in the public or private sector, know planning today is a political matter and "green" policies at local and government level are the order of today and tomorrow. The conference committee, with a sure sense of timing, has made "*The Planning Balance*" the theme of this conference and my paper is concerned with where that balance is likely to be struck in the 1990s. The "Green" or more properly called "The Environmental Lobby," cannot ignore completely economic reality and therefore there will be a swing of the pendulum between the two.

Let me start by examining why the balance has, and is still, shifting and then trace the evidence of that shift over the past 20 years and use that evidence to try and conclude where the balance is likely to rest in the 1990s. Having done so, I will look at how the balance is likely to be struck in the planning system and conclude with the possible consequences for the planning authorities, the applicant or appellant, and the objector, the Inspectors and the Secretary of State and therefore for those of us who present the arguments for them, or provide the evidence upon which the arguments are based.

The reason for the change in balance

The reason for the change is quite clearly the increasing awareness of the public, and therefore the politician, of "green issues." The awareness arises because of a series of events which have hit the headlines in the 1980s. These can be listed with some certainty:

- (i) the publicity given to the approaching extinction of many wild species--the whale, the elephant;
- (ii) the fear of using up fossil fuels;
- *J.P.L. 44** (iii) the loss of the world's rain forests at what to some is an alarming rate;
- (iv) the oil slick disasters in various parts of the world;
- (v) the effect of acid rain on the forests of Europe;
- (vi) the leaks of nuclear waste at Sellafield;
- (vii) the explosions in the nuclear power stations in America and above all at Chernobyl;
- (viii) stories of the widespread effects of industrial pollution in Eastern Europe;

(ix) the recurrent famines in Africa

(x) perhaps above all the "global warming" forecast by scientists as a result of the loss of the ozone layer and the build up of carbon dioxide in the atmosphere.

The list is long and the above is by no means exclusive. The political importance given to "green" issues can be judged from the Prime Minister's attendance and lead speech at the recent *Sunday Times* Environment Conference.

The public is rightly uneasy about the damage our society is doing to the world's environment and although the headlines and television pictures deal with the larger and more global environmental problems that unease, in the public's mind, has entered into its daily thinking and is reflected in their appreciation of their own environment and in particular upon the effect of development upon it.

As always education has an important part to play in forming the basis for future public opinion. What the child is taught in his or her formative years, provides the "informed" opinion in the next decade or so. No parent in my audience will doubt or want to resist the environmental emphasis of today's education.

This awareness of the environment does however bring tensions. Perhaps that most often met at the local level of planning is in relation to the traffic generation of proposed development. The benefits of personal transport are enjoyed by the local residents and none would voluntarily give them up. But extend those benefits to the future residents of a new housing development and they become environmentally unacceptable. Noise, vibration, exhaust emissions and the build up of lead suddenly become perceived dangers to the neighbourhood, even though factually the increases in these environmental dangers may be minimal and often imperceptible without sophisticated measuring devices. The tension in society between the "have" and "hope to have" is as potent in the environmental field as in the economic. Environmental issues however also bring dissension within the individual himself. We develop dual personalities. For example, the environmentalist at home and the polluter in the car.

The environmental awareness and the tensions that awareness brings are more apparent in prosperous regions, as we used to remember the south-east, than in the less, as we still see the north-east.

Thus planning, both in the form of the forward planning of regional, structure and local planning policies and in the form of development control decisions, has today and will increasingly in the future, be formulated and made against the background of an environmentally aware public opinion with all its tensions and inconsistencies.

***J.P.L. 45** It would seem to some that the time has come for the very idea of balance to be discarded, indeed for there to be no further development. In modern terms "The Environmental Rules, O.K."

However, life and therefore planning is not so simple. At the same time as the importance of the environment is seen to become the dominating issue, the economy of Europe is facing drastic changes. The single European Market of 1992 to many planners is something to look at from a distance in a general manner and considered, if at all, as the subject of generalised reports. But do not doubt that it will bring, and indeed European unity is already bringing, practical "on the ground" development control opportunities and problems. Industry, business and commerce are facing the necessity to renew their productive and administrative facilities, perhaps in new locations, determined by economic forces rather than environmental considerations. New factories, business and distribution premises, retail and leisure facilities will be required. New airports, runways and buildings, power stations, railway lines and termini, motorways, pipelines, electricity transmission lines, will all be needed. Many will have to reorientate towards competing in Europe.

The nation that falls behind in modern, correctly located infrastructure and development for the growth industries will disappear as a world or European economic force. As a result its prosperity and standard of life will seriously decline and resources for environmental improvement disappear. The trend towards European economic and political unity with its ever increasing momentum does not mean support for poor performing economic partners, rather the reverse. Stringent financial policies would be imposed by the European Central Bank on the defaulters and the successful will not be indulgent.

So a balance between economic forces and environmental constraint will still have to be struck in a realistic manner for the benefit of all. It is however, apparent that in the 1990s it will be a new balance tipped in favour of environmental constraint. I will now turn to the evidence to support that statement.

The evidence of a changing balance

It is, of course, impossible in this paper to sift all the evidence so I have concentrated upon the Government Circulars and Planning Policy Guidance Notes, SERPLAN's regional guidance to Government and its response, and the Structure Plan Reviews of Hampshire, Berkshire, Hertfordshire, Warwickshire, Derbyshire and Cheshire, while not ignoring, of course, the increasing number of EEC directives emanating from Brussels, to examine if and to what extent, these show a movement towards a new environmentally biased balance.

Government policy

The 1980s saw, under the Thatcher administration, a strong move to the reliance on "market forces" to regenerate what was seen as a moribund economy caught between Government interference and union dominance in the industrial and public sectors. This approach was reflected in Government planning guidance. Not least the doctrine of "presumption in favour of development" now seeming under attack from "electorial minded" politicians, of *all* parties. Nevertheless, environmental protection and constraints were not completely forgotten.

***J.P.L. 46** Let us then look at how Government policy was reflected in the advice in its Circulars and Planning Policy Guidance Notes. Circular 22/80 could be considered as the first major statement of the 1980s policy, and it states in paragraph 1:

"The planning system balances the protection of the natural and built environment with the pressures of economic and social change." (para. 1).

But there is little doubt that the emphasis was upon the positive support of development to increase the nation's prosperity as the following extracts from the Circular show:

"... the development should only be prevented or restricted when this serves a clear planning purpose and the economic effects have been taken into account." (para. 1)

"... a greater awareness of the economic costs of planning control. (para. 1)

"... no unjustified obstacles in the way of development for purposes relevant to the economic regeneration of the country." (para. 3)

"The planning system is as positive and helpful as it can be to investment in industry and commerce and to the development industry." (para. 5)

"Expansion of a town is objectionable on planning grounds if it creates ribbons or isolated pockets of development or reverses accepted policies for separating villages from towns, or if it conflicts with national policies for the protection etc." (para. 17)

This fairly consistent theme of the encouragement of development was subject, however, to the Government's commitment to the prime national environmental policies with the protection of Green Belts, Areas of Natural Outstanding Beauty, National Parks and areas of architectural, national, historical or scientific interest and listed buildings. This commitment is reflected in the Circular paragraph 4.

These policies were more fully set out in the Planning Policy Guidance Notes of 1988, particularly PPG 1, 2, 3 and 4. PPG 6 in respect of retail development maintained the reliance on market forces enshrining the Government's faith in competition. Nevertheless the prime environmental policy of the Green Belts were reinforced, for instance the latter PPG practically eliminated retail development in Green Belts.

In generalised terms the balance struck in the 1980s was the strong support of the nationally established accepted environmental policies, but in areas where these did not apply, then economic forces were to be considered as pre-eminent. This was the era of simplifying the planning system, Enterprise Zones and Simplified Planning Zones.

What evidence is there that this balance in Government policy is changing or indeed has changed?

***J.P.L. 47** I think that there are several indications, affecting perhaps different aspects of the planning system, but all pointing in one direction namely a tighter control on development projects and those promoting them. First, there was the implementation of the EEC's directive (85/337/EEC) by means of the Town and Country Planning (Assessment of Environmental Effects) Regulations 1988 and the more recent proposal to apply a procedure for the submission of environmental statements in respect of Private Bills which could authorise the carrying out of works.

Secondly, there is the increasing importance Government places on Local Plans. PPG 12 introduced that increasing importance, and indicates the considerable weight which Inspectors and Secretaries of State will place upon the policies of up-to-date Local Plans, (para. 8). Indeed the Guidance Note goes as far as to state that applicants may be held liable for costs if they cannot rebut an inconsistency with a Local Plan policy as seen by the local planning authority (para. 24).

PPG 15 continued the trend in PPG 12, and paragraph 13 states the terms of the Secretary of State's current love affair with Local Plans. Paragraph 28 makes quite clear the problems which will face an appellant who is proposing development, perhaps worthwhile in its own right, but which falls foul of perhaps incorrect development plan policies in an approved plan. He will not be allowed to re-examine or re-argue major planning issues.

The Planning and Compensation Act 1991 now provides in section 26 that the following is written in to the 1990 Act as section 54A.

"Where, in making any determination under the Planning Acts, regard has to be had to the Development Plan, the determination shall be made in accordance with the Development Plan, unless material considerations indicate otherwise."

This provision was inserted in the final stages of the Bill's passage through the House of Commons.

Thirdly, there was with the change of emphasis in the, now withdrawn, draft revision to PPG 3 in which for example in paragraph 1 the Government's four major objectives included "the encouragement and extension of home ownership" and "the provision of rented housing" was replaced by a sentence stating that providing an adequate and continuous supply of housing land is subject to ensuring that established environmental policies are maintained. Paragraph 2 makes it clear that in urban areas "there can be no question of sacrificing green spaces in towns and cities," while in paragraph 18 the Government could only see that *some* provision for housing would continue to be necessary on new sites outside existing urban areas.

Fourthly, there are the provisions of the Planning and Compensation Act 1991, which give the power to planning authorities to decline to determine similar applications to those which were made within two years of the Secretary of State's refusal to grant planning permission, or his dismissal of an appeal, and also enable the Secretary of State to dismiss an appeal if the appellant is dragging his feet in the pre-inquiry process. This Act also extends the unfortunate practice of enabling the planning authority to be judge and jury in its own case by making ***J.P.L. 48** county councils the confirming authority for their own Structure Plans, unless the Secretary of State has called in the proposals for his own consideration. I ask how many of the housing and shopping policy modifications made by the Secretary of State in recent years would have been if this provision had been in force? Furthermore, the consultation on "twin-tracking" of applications with the proposal to abolish the practice of submitting duplicate applications arose as a result of the debates on the Bill. Now thankfully dropped by the Government.

Fifthly, there is the White Paper "This Common Inheritance," paragraph 1.2 of the introduction is apposite to my paper; it states:

"In the last decade the case for market economies has emerged, coherent and formidable, as a blue print for prosperity and a guarantee for freedom. Today it is the environment that captures headlines and excites public concern."

The first of all the White Paper's objectives is "to protect the physical environment through the planning system ..." Government action in this respect is set out in section 24 and forms Annex A to this Paper. Chapter 6--"Land Use" sets out in more detail the Government's approach and although it is not possible for me in this paper to examine them exhaustively; it is however, relevant to note the priorities in paragraphs 6.5 and 6.6, reproduced as my Annex B, and to note the extension of those

relating to the environment from the nationally established and accepted, policies of the PPGs. The general tenor of the chapter is an increase in development control, for example, over the siting and design of farm buildings, all aspects of buildings on agricultural holdings of less than five acres and hedgerows. Enforcement powers of local planning authorities are to be strengthened, and importantly, new procedures "will help to ensure that the development plan system takes environmental considerations comprehensively and consistently into account."

This is the more noteworthy when taken into consideration with the White Paper's statement (para. 6.27) that it is intended there will no longer be a requirement for the Secretary of State to approve all Structure Plans or amendments to them. In other words as with most local plans, the planning authority will be final arbiter; now enshrined in the Planning and Compensation Act 1991 as referred to above.

We are promised, if that is the right word, by Government with a comprehensive review of existing Circulars and PPGs. Perhaps this is the dawn of another development plan led era.

Reading the indications together, I do not think that anyone in my audience will other than perceive a very definite change in balance in Government's future policy, with a much stronger environmental constraint on development.

As the present Government's term of office is running to an end it is perhaps relevant to speculate whether a change in the political composition of the next Government would affect the position. I believe not. From the public statements of the other two main parties I would conclude, if anything, their environmental, economic and development policies would be more constraining from a planning point of view.

***J.P.L. 49 SERPLAN's regional guidance**

To examine the changing philosophy of SERPLAN in its approach to regional planning I have looked at three documents: "South East Regional Planning: the 1980's," "South East England in the 1990's," published 1985, and "A New Strategy for the South East" published in 1990.

The first described the three major issues which emerged in considering a policy for the 1980s as:

- (i) the region's potential role in national economic recovery;
- (ii) the implication for the region's development strategy of severe restraints on public expenditure; and
- (iii) the relationship between the economic and social decline and physical decline of London and the extent of development pressures in the counties.

Protection of the environment was mainly concerned with "the extensive tracts of open countryside" which were kept free of "large scale urban development." The instruments of this policy were Green Belts, Areas of Outstanding Natural Beauty and of Great Landscape Value, Sites of Special Scientific Interest, and the agricultural grading of land.

The second document again identified three major issues, now more grandly called "three major strategic objectives." These were:

- fostering economic growth;
- revitalising older urban areas;
- accommodating new development whilst preserving the countryside.

Thus the environment, as a major matter of concern, creeps in to the top league in third and last position.

Now let us move to the last document where we again find three major issues, now, not quite so grandly called "principal objectives," stated as:

* to ensure an enhanced quality of life is available to residents of the south-east by seeking to create and conserve an ecologically sound, aesthetically pleasing and pollution free environment in town and country; to improve the quality and preserve the integrity of the region's residential neighbourhoods

and communities; and to make sure that all can share in the attractions, quality and wealth of the region.

* to maintain the region's economic buoyancy as a source of wealth and jobs.

* to enable the region to restructure in accordance with new evolving working and living patterns and to meet new requirements, continuing to pay primary regard to the older urban areas; and to guide new development to these ends.

So the environment moves from out of the frame into first place in three reviews of strategy and in a period of nine years.

***J.P.L. 50** The Secretary of State, as first by way of letters to the Chairman of SERPLAN reproduced in PPG 9 and in the future by way of Regional Planning Guidance Notes, appears to be following a similar course. In 1980 he stated three basic objectives, as improving the attractions of London, making adequate provision for orderly development in the counties, while safeguarding Green Belts, Areas of Outstanding Natural Beauty, better quality agricultural land and other areas of the countryside and to improve transport links. At that time, Government was already placing the environment partly in the frame as perhaps an equal second. In 1986 the Secretary of State took an easier line, he just adopted SERPLAN's three major strategic objectives. In 1988 and 1989 two versions of PPG 9 were published. The first merely incorporated his earlier letter in the format of a PPG. This was followed in February 1989 by a revised document which revised the housing figures in Annex A as a result of new household formation forecasts. The Secretary of State's response, in the form of an R.P.G. to the latest SERPLAN's submission is awaited. If I read the indications right he is seeking to obtain Cabinet support for quite positive guidance to be issued in the form of the direction of development in the region. Four months appears to be the period in which we will be held in suspense.

Structure plans

Four of the six counties whose structure plans I have chosen to examine, have all played an important part in accepting, albeit sometimes reluctantly, new forms of economic development and housing to meet the changing demographic pattern of the United Kingdom's population. However, in one at least, the mood has changed to firm restraint and in other cases, restraint policy given fuller expression. In the case of Hampshire, Dudley Keep, Chairman of the Planning and Transportation Committee, says it all in his "Foreword to" the "Draft Hampshire County Structure Plan 1990":

"Over the last 30 years Hampshire has played a large part in ensuring the economic success of the nation. It has accommodated the demands of thriving businesses and people attracted to the County to live. More homes have been built and jobs created in Hampshire during that period than in any other County in the South East of England.

The rate of change has been rapid. No part of Hampshire has been immune from the consequences. The time has come to reduce the heat in the County's economy before the Hampshire countryside and Hampshire people are overwhelmed.

The development plans of the 1970's and 1980's have created a secure local economy and an attractive environment which, together have enhanced the quality of life for the majority of Hampshire residents. The aim for the 1990's must be to ensure that everyone reaps the benefits.

The way ahead for the next decade is a plan which complements the emerging Regional Guidance by focusing on the importance of conservation, not only because this is an essential objective in itself but because it is an indispensable pre-condition for satisfactory economic performance.

The economy must be sustained by the creation of wealth rather than jobs, by nurturing ***J.P.L. 51** the County's own workforce rather than attracting workers from outside. The expectation of high profits from urban fringe and "green field" development must be fought by a clear commitment to resist such development. Sites which are environmentally suitable for development must be developed wisely to cope with Hampshire's needs rather than those from elsewhere in the South East.

The County Council wishes the 1990's to be seen as the time when Hampshire escaped from the treadmill of development for its own sake and moved towards a rate of development which reflects the value which local people place on their surroundings.

This document represents the latest state in the process of evolving new planning policies for Hampshire. The ideas are still in draft only. Public views and comments on other studies have already done much to shape the County Council's overall approach. We now seek comments on these draft policies.

Before studying the document it is important to understand the purpose of the structure plan. It concentrates on broad policies and general principles for development. It is designed to balance the requirements of the local economy and needs of the people of Hampshire with the need to conserve the unique character of Hampshire's cities, towns, coast and countryside.

It is also important to understand that the Plan, while driven by the desire to conserve the environment, makes a significant contribution to the housing and employment needs of the region and the nation.

I am aware that those who disagree with the Plan, in whole or part, will say so. However, I look forward to hearing from those who support the plan and share the County Council's vision of the Hampshire of the 1990's."

It is interesting to note that this foreword is omitted from the submitted plan but is reflected in that plan's "A Vision for the 1990's."

"The vision driving the County Structure Plan is that of a prosperous County where the quality of life is enhanced by an attractive environment within which the unique character of Hampshire's cities, towns and countryside is maintained and enhanced, and where the pursuit of economic growth is replaced by the desire to sustain what already exists. It is a vision of a County where the pace of change is slower than at present; where employers and employees feel secure; where the countryside is protected; where the identity of individual settlements is retained;"

"and where infringements begins to catch up with the needs of local residents." (Submitted County Structure Plan--para. 19)

The Structure Plans for Hampshire, there are in fact four in the 1970s and 1980s, were according to the author "largely market led; dominated by a desire to generate prosperity and house a burgeoning population." How things have changed!

***J.P.L. 52** Compare the first general strategy policy of the First Alteration of the South Hampshire Structure Plan 1988.

"POLICY GS1

SUFFICIENT LAND WILL BE BROUGHT FORWARD TO PROVIDE FOR THE CHANGE AND DEVELOPMENT RESULTING FROM SOUTH HAMPSHIRE'S ROLE AS A GROWTH AREA IN SOUTH EAST ENGLAND"

with that of the draft Plan 1990, repeated in the submitted plan:

"POLICY GS1

THE OPEN COAST AND COUNTRYSIDE WILL BE CONSERVED AND ENHANCED."

Draft policy GS7 sets the general approach to economic development, it states:

"POLICY GS7

THE DEVELOPMENT OF LAND FOR HOUSING AND EMPLOYMENT WILL BE SELECTIVELY RESTRAINED WHILST PROVIDING FOR THE PARTICULAR NEEDS OF LOCAL AREA."

The new draft plan reduces the provision of housing land from 7,644 dwellings per annum in the 1983-1989 plans to 6,000 dwellings per annum, a 21.5 per cent. reduction. The submitted plan takes the matter one step further, reducing the provision to 4,268 dwellings per annum, a 44 per cent. reduction. The industrial/business land supply, although more difficult to compare because of the changes in the Use Classes Order, and a mixture of floorspace and land provision, is reduced approximately from 35 hectares per annum to 17 hectares per annum, a 49 per cent. reduction. What in practice the policies would mean is the control of development to the existing level of commitments, the theoretical export of population and a consequent reduction in the county's labour force.

In the Berkshire Structure Plan Review of 1991, there is a similar foreword by Philip Houldsworth, the Chairman of the *Environment* Committee. He again notes the high levels of sustained growth experienced by the county in the past, a result of which he records as the substantial reductions in growth from the 1988 plan. The serious impact on the character and environment of the county of accommodating further growth to 2006 appears to be his concern.

The plan reduces the previous plan's housing provision from 3,625 dwellings per annum to 3,006 dwellings per annum, a 17 per cent. reduction and the employment provision from an equated land and floorspace provision of some 229,000 sq m per annum, to a figure of 94,375 sq m, a 59 per cent. reduction.

Although a somewhat different picture emerges from a study of Hertfordshire's Structure Plans. A new policy has been introduced as Policy 5A in the 1991 Structure Plan Review, which reads:

***J.P.L. 53** "POLICY 5A

IN IMPLEMENTING THE POLICIES AND PROPOSALS OF THIS PLAN, LOCAL PLANS AND INDIVIDUAL PROPOSALS WILL BE EXPECTED TO TAKE FULL ACCOUNT OF, AND WHEREVER PRACTICABLE TO INCORPORATE, MEANS OF IMPROVING THE PHYSICAL ENVIRONMENT, CONSERVING AND IMPROVING HABITATS AND REDUCING WASTE, POLLUTION AND CONGESTION IN HERTFORDSHIRE."

The housing land provision is only reduced from the 1986 Review of 4,167 dwellings per annum, to 3,800 dwellings per annum, a reduction of 9 per cent., while the business floorspace provision *increases* from 46,200 sq m in the 1986 Review to 116,667 sq m in the draft 1991 Review.

Although similarly, Warwickshire's 1991 Draft Structure Plan Review shows a slightly increased level of housing and employment land provision over that in the 1987 plan, the objectives of the new plan are more environmentally motivated under pressure from the results of publication consultation.

This consultation revolved around four key issues and below I record the results.

| | More | Same | Less |
|---|------|------|------|
| | % | % | % |
| 1. What emphasis should be given to protecting the environment? | 82 | 15 | 3 |
| 2. Should we attempt to foster or restrain economic growth and development? | 32 | 25 | 43 |
| 3. How much housing should be built? | 31 | 35 | 33 |
| 4. What emphasis should be given to new road building? | 40 | 39 | 21 |

These results give an interesting insight into the tensions of individuals and society. An overwhelming majority sought to increase the environmental emphasis but roughly a third still wanted economic growth, more houses and more roads, while another third wanted at least the same amount.

Looking at Derbyshire, the new submitted Review Plan also slightly increases the housing and industrial allocations and the general strategy policies concentrate first on meeting economic demand subject, of course, to the need to protect and enhance the environment.

Finally turning to Cheshire, here we have the benefit of recently published Secretary of State's modifications to the Replacement Structure Plan.

It is interesting to record that the submitted plan was based upon a demand-led strategy and the debate at the E.I.P. appears to have significantly revolved around whether the emphasis on meeting the market demand could threaten the environment. In the event the Secretary of State proposed to reduce the housing provision to 2001, remove the county wide employment land provision and delete the policy for an airport related business park in Macclesfield on environmental grounds.

***J.P.L. 54** The conclusion from my brief study of the changing nature of strategic policies and attitudes to the balance between economic forces and environmental constraint is that it is not uniform. But the increasing importance of environmental considerations and consequences is plain to see. The result is a stronger tendency to restrict the two main indicators of economic forces, housing and employment development.

The Review of the Surrey Structure Plan Consultative Draft is still awaited and if the past is any indicator this will emulate the Hampshire approach.

I have placed some emphasis on the south-east region in my analysis of structure plan trends but it is in the region that the environmental constraint is most clearly emerging, and where the philosophy of balance in the 1990s will be made. That balance when struck, will influence planning policy in the other regions. It is relevant that the tensions brought to the surface by the Structure Plan debates are at this moment in time the subject of determination by the Secretary of State. I will examine the future position later.

The likely balance of the 1990s

The evidence examined in the previous section of this paper is sufficient to acknowledge a shift of the balance towards greater environmental protection. What tensions will this produce in society, can it be sustained, and what cost in economic progress will it entail?

Let me first establish some fundamental truths in this traditionally emotional subject. First, the more prosperous and more sophisticated society becomes, the more attention is focused upon environmental issues. Secondly, the ups and downs of any national economy changes the political and public perceptions of what is the prime objective of policy at any one particular time. For example, the challenge as seen by the Thatcher Government was to reverse the stagnation in the British economy and create prosperity. The success of the economic boom of the late 1980s, illusory as it may appear today, created the very prosperity and sophistication which brings safeguarding the environmental issues into the foreground.

As we in this country are once more faced with an economic crisis, seemingly unmanageable, and with sole reliance on fiscal policy appearing inadequate, it could be argued that the present "green" fashion will wither before economic reality. In other words the pendulum will swing with unemployment, a feature in this recession of all regions, (including the previously prosperous south-east), the environmental lobby will have to give way to economic development reflecting the need to create job opportunities and the need to sustain and increase national prosperity and thereby the United Kingdom's standing in the European and world stage.

I do not think so for various reasons. Looking at Europe the economically successful countries, for example, Germany, and a resurgent France, are achieving their success within an environmental framework.

David Trippier, Minister of State for the Environment and Countryside in the present Government, in an address to the Fellowship of Engineering and the Engineering Council in May of this year, said:

***J.P.L. 55** "We [the Government], are convinced that economic development and environmental protection need not be irrevocably opposing principles but can instead complement each other. Development provides the wealth to invest in cleaner methods of production, the means to husband natural resources and the freedom to adapt a longer term perspective on the value of environment assets."

The question is therefore where is that overall balance likely to be struck in the Development Plan system, and from where will the conclusive influences come?

In spite of the present political furore over to what extent Britain will become a complete partner in the United Europe, EEC directives will exert in the 1990s an increasing influence over the environmental policies of this country, the consideration of the environmental consequences of particular

developments, and the impact of environmental law. Whether there is to be a Federal Europe or not, no future British Government will be able to ignore the environmental standards set in Brussels. The past presages the future. Thus Government policy will be, perhaps sometimes reluctantly, drawn into accepting the European environmental lobby's dictates.

Of equal importance is the growth in importance of the environmental lobby in this country. Such organisations as "Friends of the Earth" are, with increasing professionalism, extending their influence. They are selling an environmental product which is more and more accepted by the public and recognised by industry.

So where is the balance between economic forces and environmental constraints likely to be struck in the 1990s? It is clear that the balance in favour of market forces of the 1980s will be eroded. In the areas of past economic growth the balance will inevitably move to environmental protection at both Governmental and local levels. The message appears to be "enough is enough."

The balance however, in the less prosperous regions, and areas within regions, is likely to be different. It seems environmental restraint will be the method of directing economic growth to what are in the Government's opinion, less environmentally threatened and less congested areas of the country. Michael Heseltine made this clear in his speech to the Conference on South-East Planning in March of this year. To summarise he said the south-east should not attract disproportional prosperity or the brunt of development; it must live within its environmental means, only the essential minimum of its countryside should be sacrificed for development; it makes no sense to concentrate activity in one corner of the country; there is a priority for promoting regional economic development.

The stage is therefore set. Environmental considerations will become more important. However, the importance, as I have indicated previously in this paper, will vary according to prosperity of the area; less important where prosperity is low, more important where prosperity is high.

We come therefore philosophically full circle. Environmental constraints are a product of prosperity and sophistication. My comments are, of course, concerned with land use aspects, an able paper by Stephen Tromans makes it clear that when it comes to operational environmental control of particular activities this will be increasingly strict and universal.

***J.P.L. 56** At this stage I should perhaps state my convictions as a "latter day environmentalist." I believe that economic forces should not have a priority in all circumstances. I welcome the thinking behind the requirement for Environmental Impact Assessments. The environment is easily eroded and once eroded, cannot be replaced. However, as the White Paper "This Common Inheritance" states, "We must act on facts and the best analysis of likely costs and benefits." This succinctly sums up my position. Analyse a development project in all its aspects; economic good; environmental disadvantages, together with the land use, visual and transportation consequences and then draw a conclusion on the balance of the benefits and disbenefits. If the analysis is done professionally and objectively, it should not matter whether the particular project is in the so-called prosperous south-east or the so-called less prosperous north-east. The environment is universal. I believe in the quotation which forms the foreword to the White Paper from John Stuart Mills.

"Is there not the earth itself, its forests and waters, above and below the surface? These are the inheritance of the human race ... What rights, and under what conditions, a person shall be allowed to exercise over any portion of this common inheritance cannot be left undecided. No function of Government is less optional than the regulation of these things, or more completely involved in the idea of a civilised society."

So much for personal indulgence, let me now turn to how the new environmentally based balance will be implemented.

How will the new balance be struck?

Given the inevitable political and public pressures for a more environmentally biased planning framework how is this trend likely to be transported into the planning system. Let me speculate.

First, the present major national environmental policies will be strengthened. Significant "inappropriate" development in the Green Belt or releases of land from the Green Belt are likely to be a thing of the past. In environmental terms, an almost "extinct species." Very special circumstances will become very special indeed. The purposes of Green Belts are likely to be extended and the

consequences flow out into adjoining countryside. Special designations such as Sites of Special Scientific Interest and Areas of Outstanding Natural Beauty and buildings of architectural and historic importance will be used in a more restrictive manner. The recent "call in" decisions of the Secretary of State on Cliffe Marshes on the Isle of Sheppey in Kent, Chichester Harbour in Hampshire and the Dee Estuary in Clwyd, are evidence of this. Also there is the overriding of the Inspector's recommendation in the Tetsworth appeal on environmental grounds related not to any major national designation but to a countryside area.

Secondly, the mandatory requirement for Environment Impact Statements is likely to be extended to cover all significant development projects. The appraisal of those statements by local planning authorities and objectors will become more detailed and may be State funded. The mere production of a statement will not be sufficient; its scope, objectiveness and quality will be under scrutiny and questioned. At the moment the developer is responsible for submitting the Environmental Impact Assessment and appoints the consultants to carry out **J.P.L. 57* the appraisals. There is at present no system of consideration of the technical results. The planning officers and members of the relevant local authority are the arbiters in the sense that they approve or refuse the development for which the Environmental Impact Statement has been prepared. It is possible, with advantages to all parties, that an independent scrutiny of E.I.A.'s will take place. At the moment, the problem is who will fund it!

The consequences for the developer, including his industrialist and retail customers, the planning authority, the objector, and the planner and planning bar

It is clear that the consequences of the likely change in balance of planning policy towards environmental constraint, emanating from the EEC, Government, strategic authorities (if they survive), and local planning authorities, are of fundamental importance.

It is a daunting task to deal with them adequately in this paper. However, I will try and approach them in a logical fashion, but will leave aside the implications of environmental law.

I therefore propose to deal with this section of my paper under the following headings:

- (a) Common factors;
- (b) The developer at risk;
- (c) The responsibility of the planning authority and their officers;
- (d) The position of the planning consultant

(a) Common factors

The first and obvious factor is that all concerned with strategic planning, local plan proposals and individual projects must be environmentally aware. What does this mean? It means that policies, proposals and development projects must have from their inception, an environmental input. Not as most often today say the policy, proposal or project first, and then an environmental assessment after. Those projects that may be successful, in terms of being upheld under attack or achieving implementation, will be those that were promoted from the outset with the environmental consequences, good or bad, in mind.

Commercial gain and restraint for restraint's sake will have to be balanced against an overall environmental background. In both private and public sectors that may be too much to achieve but it is what an environmentally biased successful policy background will demand. Any planning policy framework will otherwise fail to achieve its objectives on two counts. First, by depriving the level of economic growth necessary at least to replace outworn facilities, the wealth necessary to preserve and enhance our environment will be denied. Preservation of the environment does not come cheap, and prosperity is a necessary prerequisite to secure it. A point often overlooked by environmentalists, depending for the most part on private or public sponsorship.

Secondly, over-restraint in one area must lead to the meeting of legitimate development pressures in another if we as a nation are to be a competing economic force. It is not enough to state that there are undeveloped parts of the country in which development can take place unless the long term economic consequences of such direction are taken into account.

***J.P.L. 58** In particular, I would emphasise the long term economic competitiveness of the location for the activity in question. Often in growth industries the effect of an inappropriate location on economic competitiveness is hidden in the short term by market conditions and new production facilities. But the long term exacts a much harsher judgment.

The false hopes of regional diversification are the more painful in times of economic difficulty. If, as I believe, environmental assessment of any major project is important so is the appreciation of the economic consequences of refusal on environmental grounds especially if these are not fully substantiated on a factual basis.

Which brings me to my main point in the striking of the balance. What is required is more facts and less speculation about the environmental consequences of development in any one particular area which leads to misconceptions, which once conceived are difficult, if not impossible, to remove. I therefore make a plea on behalf of the business community and the environmentalists for Government to fund more research in this area. An environmentally conscious national policy cannot be left to speculation but must, as the Environmental White Paper declares, be based on FACTS.

(b) The developer at risk

For some time now "the developer" has been the subject of severe public and sometimes Government criticism. He is often portrayed on television as a criminal and the image sticks. He is, according to some environmentalists, rapacious, unfeeling to local concerns and only interested in making money. That is of course, true of some. However, the majority of us live in homes built by developers, and work in factories and offices provided by developers, often at financial risk. In the environmentally biased planning background which I have foreseen in this paper however they run an even greater risk. If at their best, they have contributed to the present stock of modern business facilities and homes for us to live in, roads for us to drive upon and landscaped areas for us to enjoy, they must be a species to preserve even in environmentally biased times.

How, with environmental benefit?

In the anticipated policy regime it will not be easy. The use of the appeal procedure to expand the merits of their particular proposal will be eroded. It will be appreciated from my paper that approved or adopted plans will be in the future considered as the major factor in any planning decisions and the applicant or appellant will, where the proposal conflicts with the policies of such plans, have to prove that there are material considerations which override those policies.

Where therefore does the presumption in favour of development in PPG 1 stand, or indeed, the principle of each case on its merits? The promised review of Circulars and PPG's may answer these questions.

What therefore is the solution?

It must be in the developers adopting a more proactive rather than reactive position. That is, ***J.P.L. 59** an early involvement in structure plan and more particularly local plan procedures. Easy to say but much more difficult in practice. For instance, the developer often does not have a land holding in the area at the time of the plan preparation and statutory process, but acquires his interest later. Remember the build up of a land bank has been seen as incompatible with the planning process and often financially disastrous.

Perhaps the commercial developer will have to take a leaf out of the House Builders Federation's book. They have, with benefit, presented well argued cases at E.I.P.s and local plans on behalf of their members. Perhaps a new federation of commercial developers is an answer, or such action by the British Property Federation. Certainly, in my experience, planning authorities have welcomed the overall approach in discussions with the House Builders Federation rather than specific site arguments. At least the commercial development industry should quickly become aware of the problems they will face and take steps to ensure that their interests are properly represented at the early development plan stages. The same is equally true of the business and industrial organisations and communities; through their organisations, e.g. the Chambers of Commerce, Confederation of British Industry and British Retailers Association, they will have to fund the technical presentation of the cases for sensible and sustainable economic policies in the development plan debate.

There are however, at least two aspects of the Government's policy of attaching increasing weight to

development plans which disturbs me. First, is the likelihood that in the future in nearly all cases of plan preparation the planning authority will be the confirming authority on their own plan. Properly challenging a structure or local plan is a costly and time consuming exercise. It has to be financed before the commercial value of the land in question has been established. Will land owners, developers or business organisations be willing to undertake such exercises when the results rest in the hands of the instigators of the policies they need to change?

The second matter is the difference in the appropriate approach to the consideration of alternative proposals for a site in respect of a local plan objection and a section 78 appeal. In the former case it may be proper for an Inspector to consider the relative merits of the two proposals and decide that in planning terms one is to be preferred and therefore obtains a specific allocation in the plan. Such a preference could be irrespective of the commercial prospects of the implementation. At a section 78 appeal on the other hand, the Inspector should not be concerned with alternative proposals but rather with whether the proposals before him should receive planning permission. If the section 78 appeal follows the local plan adoption the appellant will now be in difficulties because he would apparently be in conflict with the development plan. The onus of proof would appear to be transferred to him to demonstrate his proposals should take precedence over the development plan allocation.

(c) The responsibilities of the planning authorities

Here, if not before, I step into a minefield, through which Martin Simmons will also be treading, no doubt with more adroitness than I. I hope however that so far I have come through without the ultimate disaster putting a foot in the wrong place!

I start hesitantly, with the county planning authorities. In my personal view, in spite of **J.P.L. 60* particular differences of opinion in the past, long may they continue their co-ordinating function in the planning system, with the current overview of the Secretary of State. Otherwise planning could descend into an even more parochial dimension.

The counties' responsibility, in an environmentally conscious world, is to ensure that with their greater technical resource ability they produce the environmental *facts* upon which local plans can be subsequently produced. They should be able to liaise with their adjoining counterparts to bring into implementation the rather vague regional guidance which is emanating from the Secretary of State. The encouragement currently being given to the establishment of Regional Planning Conferences on the lines of SERPLAN could lead to a new nationwide dimension in our planning system. The influence of, and the benefit from these conferences, has yet to be assessed.

In this respect, SERPLAN, with all its deficiencies, for instance, no private sector representation, is still the best example this country has to offer. London Planning Advisory Committee in London is doing its best to provide some kind of capital city overview after the demise of the G.L.C.

However, the ultimate responsibility for development control, and therefore the sharp end of the implementation of environmental policy, lies with the district councils. Here lies the rub. However strong and experienced the planning officer and his department may be, the local politicians rule the roost. To be fair they have their democratic seats to protect but inevitably listen to the vociferous minority. This is likely to lead to an emotional rather than an objective, well researched factual appreciation "environmentally" biased formulation of policy and its implementation. I use the word environmental with quotation marks because it is invariably not derived from an environmental overview of the area but a response to local pressure groups.

It is therefore the district planning authorities' responsibility first to have an appreciation of the environmental *facts* and then to relate those *facts* to their policy making and their development control decisions.

Why do I sound critical of district authorities? It is because in my experience it is at this level that most often I find members overrule the professional advice that is offered to them, even if this results in appeals and costs awarded against them?

It really comes down to this, if the Government wishes, as it appears at the present time to do, to place the onus of an environmentally orientated land use policy upon the district councils and their local plans, it is incumbent on them to set out clear guidelines as to their role in a regional strategy and to ensure that sufficient independent factual research on environmental matters is available to members.

(d) The position of the planning consultant

To be worthy of the name, the planning consultant must resolve in his or her own mind where he or she stands on environmental issues. The balance has shifted towards the preservation of the environmental and certainly I for one, believe this is right, in the sense that more than in **J.P.L. 61* the past, environmental issues are increasingly more important and pressing. This however does not mean that development should, or can, be prohibited. What it does mean is that development should be more environmentally aware. The planning consultant, whatever his or her speciality is, must expose themselves to the developing science of environmental protection and absorb the basics of this new science. I use the word "science" deliberately because environmental decisions must be based on the analysis of factual information. They should not be based on speculation or media led fears.

This means that the consultant from the receipt of instructions and the preparation of the first report must consider, the environmental consequences of the development proposal along with the commercial and planning policy aspects.

Nothing new you may well say, but I mean a detailed environmental preview, not a walk round judgment. The consequent report should be sufficient to indicate whether, and what, specialist advice is required before the client proceeds with the project.

So far so good, but there is a further and more practical problem facing the consultant in this environmentally aware era. This, as I have previously referred to is the present Government's commitment to implement this new emerging "green" policy by handing more decision making to the district councils, and in particular to their Local Plans.

This is, to be frank, a planning dilemma, if not a planning nightmare, for planning consultants. There are many reasons for this and I have highlighted a few. Predominantly, at the time of the promotion of a Local Plan or its review, your client may have had a minimal or no land interest and little commercial commitment. He, and therefore you, have no requirement to challenge the balance of economic forces as against environmental constraints in the Local Plan are in question. Subsequently your client acquires a land interest or a commercial requirement and could be faced with unchallenged and therefore, adopted restraint policies. These policies are now to be, through the Planning and Compensation Act, the determining factor in considering any new development proposal, unless material considerations can be produced which demonstrate otherwise.

What, however, is clear to me is that the planning consultant with his or her training and experience is well suited to take a managing and co-ordinating role in bringing to the development industry the necessary environmental awareness in a practical form. We are not environmental scientists but we have to become familiar with their techniques and harness them to produce the required balance to enable worthwhile developments to proceed to the wider benefit of the country. The middle ground is familiar territory to the consultant, often in my experience advising his client to modify his proposals to improve their environmental qualities and persuading the planning authority of their economic merit.

Here is the natural balance of environmental and economic forces. It is an exciting and demanding role.

Conclusions

There can surely be no doubt that the balance in planning decisions between economic forces **J.P.L. 62* and environmental constraint has, and will in the 1990s even more, move towards the latter. I believe my paper clearly demonstrates this.

When then will the balance lie?

I have already made it clear that today and even more so in the future, nearly all planning decisions have a political dimension. They also, without peril to the planning system, cannot ignore economic reality. Two factors that ensure the balance I refer to will in the future, as in the past swing, like a pendulum between the two extremes of environmental dominance and reliance on market forces. Wherever the pendulum swings however in the next decade at least it is unlikely to swing as much in favour of market forces as we saw in the 1980s.

In all areas the major national environmental designations will be even more stringently protected.

Thus, development pressures will be concentrated in areas not subject to those designations. It is, therefore, in these locations where a variation in where balance will be struck will be most apparent, such as the south-east, which have accommodated substantial development in the recent past, thereby increasing their and the nation's prosperity, environmental constraint will be used to try and prevent development. That attempt will be made whether the location proposed is most appropriate in the national interest or not.

In contrast in less economically successful regions more pragmatic judgments may prevail, and the benefits of increased job opportunities, greater prosperity and infrastructure improvement may outweigh many environmental considerations. Thus, while the balance in 1990s will have a greener bias the share of green will vary across the country.

There is also of course the continent of Europe to consider as the attitude to the environment in the United Kingdom will reflect that adopted in Europe as a whole. It is clear that Brussels is drawn to environmental issues like a moth to a candle and we must expect a continuing supply of EEC directives even more stringent and detailed. Yet at the same time, the economic development potential of the geographically favoured areas of France and Germany will be competing with us for the "Footloose" international companies.

Again as we have found so many times in this subject there is a contradiction in trends and the potential for further tension as Europe feels its way to an overall balance.

Two questions arise--will the balance be better for the nation as a whole and will it be sustained in the face of economic reality? I leave these questions with my audience.

With regard to how the balance will be implemented, I think this has become clear, unless of course a new Government changes the ground rules. Central Government it appears, will rely upon its Common Inheritance White Paper and its Regional Policy Guidance. It clearly appears to be happier with the statement of broad principles than getting involved in specific planning policy or allocation decisions. When called upon to make such decisions they will have an environmental bias. In practice the presumption in favour of development will be eroded. The planning authorities will inherit a greater freedom to prepare policies, make land use allocations and then assess and adjudge upon any consequent representations. Thus formulated and adopted as part of the development policy, they will predominate. In this way **J.P.L. 63* local environmental concerns will inevitably be given greater emphasis, and development requirements not necessarily accommodated.

The consequences for the participants in the planning system will be substantial. The promoter, *i.e.* developers, retailers, industrialists and business organisations, will I believe be put at a disadvantage. To overcome that disadvantage they will need to be more sophisticated in their approach. Environmental issues should become an early consideration in any development project or decisions on alternative development opportunities. The possible environmental benefits accruing or which could possibly be incorporated will have to be assessed as well as the normal commercial criteria.

The promoter must become involved in all stages of policy formation--regional advice to the Secretary of State, his regional guidance, structure plan preparation and local plan consultations. Leaving matters until E.I.P.s, local plan inquiries and particularly section 78 appeals could be too late. Nevertheless these must not be allowed to become so reduced in importance as to become ineffective in correcting inappropriate policy formation, and thereby enabling the development industry to play its vital role in renewing and providing the property facilities upon which our nation's prosperity and standard of life depends.

How can the promoter and his advisors become involved in consultation in a practical and influential way? I believe this could be achieved, as previously indicated, by the use of the national bodies which represent the various interests involved in economic and housing development. We all recognise the good work done in the housing field by the House Builders Federation and their example must be followed by commercial developers, businessmen, industrialists, retailers, etc. The cost of the representations could perhaps be met by way of a special planning levy on members. Of course individual members would still fund their own specific representations separately.

The Government can assist in obtaining a balance consultation at the strategic level by issuing guidance on the formulation of Regional Planning Conferences to ensure that they include *permanent* members representing development, retail business and industrial interests. The Department of the Environment can also ensure such interests are represented at E.I.P.s and the Secretary of State should issue guidance that specifies representative bodies or organisations should be involved in the

consultation procedures for local plans.

In respect of individual development projects, the promoter must make the environmental running with the issues in the forefront of early decision making and in all major developments a voluntary Environmental Impact Statement should be prepared. This statement should be objective and professionally produced, and I believe that it would be in promoters' interests if Regulations were introduced to set out a more detailed specification for the work required and even better if an adjudication body was set up to which the most important Environmental Impact Studies could be submitted for assessment and for comment. In these ways a minimum standard of production would become easily recognised and the public would gain confidence in the procedure.

The consequences for the planning authorities are perhaps more difficult to firmly grasp. But one event is necessary, namely more freedom must bring more responsibility. More responsibility in assisting development in the nation's overall interest; more responsibility in modifying policies to meet representations properly formulated and factually supported; more responsibility in requiring environment constraint to be properly evaluated on a factual basis; more responsibility in reconciling local prejudices with the wider world surrounding them and economic reality.

The alternative may be for the planning authorities to face more challenges in the courts as the only course available to the promoters or land owners whose representations have been given inadequate consideration.

To the Secretary of State and his Inspectors I respectfully suggest that it is remembered that a healthy development industry is an essential part of a healthy economy, that most development is to meet people's needs and requirements and that which is environmentally aware should be supported, even if legalistically it conflicts with the wording of adopted policies but would cause no unacceptable consequences in the real world.

The important issue is not so much where will the overall planning balance be struck but whether it will be struck after careful and reasoned consideration and with an understanding of both economic forces and environmental concerns.

<HCE>Annex A </HCE> <HCE>Land Use and Planning </HCE> <DPE1>To ensure that the planning system properly reflects environment priorities the Government will:</DPE1> <DPE2>* review national planning guidance;</DPE2> <DPE2>(6.33)</DPE2> <DPE2>* develop planning policy guidance on planning to conserve energy;</DPE2> <DPE2>(6.34)</DPE2> <DPE2>* work to improve the operation of environmental impact assessment;</DPE2> <DPE2>(6.38)</DPE2> <DPE2>* align planning pollution control mechanism over special industrial activities;</DPE2> <DPE2>(6.40)</DPE2> <DPE2>* provide greater flexibility for planning agreements to offer environment improvements alongside new developments;</DPE2> <DPE2>(6.42)</DPE2> <DPE2>* encourage the best locations and design of housing;</DPE2> <DPE2>(6.44)</DPE2> <DPE2> ***J.P.L. 65** * review methods to achieve the best balance between economic and environmental costs and benefits in transport planning;</DPE2> <DPE2>(6.52)</DPE2> <DPE2>* improve the arrangements for considering the environmental impacts of new railways;</DPE2> <DPE2>(6.55)</DPE2> <DPE2>* review the operation of the law on after care conditions for mineral workings;</DPE2> <DPE2>(6.57)</DPE2> <DPE2>* legislate to improve compensation payments where homes are affected by major new developments.</DPE2> <DPE2>(6.59).</DPE2> <HCE>**Annex B </HCE> <HCE>Land Use and the Planning System; </HCE> <HCE>The Governments Objectives </HCE>** <DPE1>6.5 Conservation and development should not be seen as necessarily in conflict. For example, conservation enhances tourism, which provides 1.1/2 million jobs in Britain (see also Chapter 7). Policies for land use must weigh and reconcile priorities in the public interest. Some priorities are primarily economic.</DPE1> <DPE2>* growth in the national, regional and local economies;</DPE2> <DPE2>* land and premises to provide people with jobs;</DPE2> <DPE2>* housing to meet the needs of all sectors of society;</DPE2> <DPE2>* a physical safe environment, in which planning helps to ensure for example that proper precautions are taken against the risks that flooding, subsidence or incidents are major chemical installations might pose;</DPE2> <DPE2>* prime agricultural land for food production;</DPE2> <DPE2>* safe and efficient transport systems;</DPE2> <DPE2>* access to shops which provide choice and value;</DPE2> <DPE2>* the best of mineral resources.</DPE2> <DPE1> ***J.P.L. 66** 6.6 Other priorities have conservation as their common flavour;</DPE1> <DPE2>* sustaining the character and diversity of the countryside, including its wildlife habitats;</DPE2> <DPE2>* reserving use of high grade mineral resources for the most appropriate use, wherever practicable;</DPE2> <DPE2>* defending green belts to check urban sprawl and provide a breathing space for city dwellers;</DPE2> <DPE2>* maintaining the character, as well as the vitality, of town and city centres;</DPE2> <DPE2>* revitalising older urban areas, so

that they become more pleasant places to live and work in;</DPE2> <DPE2>* safeguarding and improving the amenity of residential districts;</DPE2> <DPE2>* giving high priority to conserving the built heritage to good design in new development and to encouraging the arts.</DPE2>

J.P.L. 1992, 19, Supp (Occ. Pap.), 43-66

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