

Planning for the future! SDC response to the Planning Green Paper

01.03.02



Sustainable
Development Commission

SUSTAINABLE DEVELOPMENT COMMISSION

'PLANNING FOR THE FUTURE!'

RESPONSE TO THE PLANNING GREEN PAPER

1. PREFACE

1.1 Introduction to SDC

The Sustainable Development Commission (SDC) welcomes the opportunity to respond to the Government's Green Paper on reforming the current planning system '*Planning: Delivering a Fundamental Change*'.

The SDC was launched by the Prime Minister in October 2000, subsuming the UK Round Table for Sustainable Development and the British Government Panel on Sustainable Development. The SDC consists of twenty-four members from all sectors of society - business, NGOs, local and regional government, academia - and all parts of the UK (a list of our Commissioners is shown in the appendix 1).

The SDC's role is to advocate sustainable development across all sectors in the UK, review progress towards it, and build consensus on the actions needed if further progress is to be achieved. The Commission considers the planning system and land use to be one of the key delivery processes for advancing sustainable development in the UK.

1.2 Welcoming the reform

The Commission greatly welcomes the Government's commitment to reforming the planning system and recognising the weaknesses

of the prevailing system, some of which impede the advancement of sustainable development.

The Commission is delighted to have the opportunity to respond to the Green Paper. In responding, we have established a steering group of key Commissioners to guide our process and have contracted consultants Jeff Bishop (Director of BDOR) and John Baker (Director, Baker Associates) to assist us in formulating our response. This response aims to be a highly constructive contribution to the debate about the contents of the Green Papers and to help the Department to develop their ideas in a way that will best assist the advancement of sustainable development.

The response therefore includes a number of positive, practical and proven approaches. As a result, the Commission would wish to arrange an opportunity to discuss and develop these ideas with the Green Paper team early in the process that leads to any eventual legislation and guidance.

1.3 Structure of Response

Our response comprises of four key sections.

- Firstly, we briefly outline the relationship between sustainable development and the planning system. This emphasises the centrality of sustainable development within land-use planning and the value of sustainable development as a framework for reforming the planning system. It also states the benefits of a planning system which adopts this framework in advancing sustainable development.

- Secondly, we discuss three concerns arising from the Green Paper. These are: the centrality of sustainable development within the Paper; the political and economic imperative for reform; and the general lack of detail on enabling joined-up delivery and policy frameworks.
- Thirdly, we consider in more detail specific proposals within the Green Paper, how these may or may not contribute to the delivery of sustainable outcomes and, importantly, identifying areas where further thought may be required and where the Commission may be able to offer support.
- Appendices – Presented in Appendix 2 is the broad approach taken to assess the key proposals set out in the Green Paper. This is based on four key principles of sustainable development (resource management, governance, long-term thinking and integration). We identify under each principle the strengths and opportunities, gaps and challenges and key implications in relation to the main proposals in the Green Paper.

2. LINK BETWEEN SUSTAINABLE DEVELOPMENT AND PLANNING

There is an intrinsic link between sustainable development and planning. Fundamentally, sustainable development is about shaping and changing patterns of development to ensure that

social, economic and environmental needs can be met simultaneously, for present and future generations.

The planning system, which will determine the location and form of development, is therefore a key mechanism for delivering sustainable development. It affects the use of resources, especially land, but also key 'life support' systems (e.g. water, biodiversity, air quality). It also determines the spatial distribution and intensity of activities that have wide-ranging and lasting social, economic and environmental impacts.

Sustainable development offers the only framework for fostering a planning system which we believe can deliver sustainable outcomes. It offers the ability to integrate social, economic and environmental benefits. It offers a longer term perspective to development which considers the needs of present and future generations. It also offers a requirement to ensure participation and effective governance at all levels of decision-making. Most importantly, it requires prudent use of resources and minimal environmental damage.

Accepting sustainable development as the central organising principle for reforming the planning system would therefore not only ensure a planning system that can deliver, but also one which delivers outcomes which are sustainable.

3. COMMENTS ON OVERALL APPROACH OF THE GREEN PAPER

In responding to the Green Paper, the Commission would firstly like to comment on three re-occurring themes which, we feel without further development, will hinder the ability of the reform proposals to deliver sustainable outcomes.

3.1 Centrality of sustainable development

There is very little reference to sustainable development within the Green Paper and this does not inspire confidence. Sustainable development is implicit rather than explicit in the Paper. The scant reference to this concept, and absence of anything other than a superficial understanding of what sustainable development means in practice, gives rise to concern and uncertainty over how the reforms outlined in the Paper will lead to the delivery of sustainable outcomes.

It would be better if the Green Paper made it clear from the outset that the relationship between planning and sustainable development was understood and that the overarching purpose of planning was to deliver sustainable development.

3.2 Imperative for reform – Efficiency vs. Effectiveness

The Green Paper's emphasis on improving the speed and efficiency of the decision-making process addresses more the symptoms of the failings of the current system (namely, a cumbersome system which fails to deliver to time) than the causes (inadequate structures to encourage long-term and integrated thinking which can deliver sustainable outcomes).

Although issues of speed and efficiency are important, this should not occur at the expense of good planning. We, therefore, feel that the political imperative for reforming the system is starting off on the wrong foot! This leads to some important gaps in the Green Paper in addressing the core causes for why the current planning system is not delivering sustainable outcomes.

Consequently, the Paper fails adequately to set out how specific sustainable outcomes may be achieved through reform of the planning system. These include, brownfield targets for new house build, higher density and mixed use development, reinvigorating the rural economy and renewable

energy requirements. It also does not propose new techniques for assessing applications which involve radically conflicting interests and significant long-term impacts.

Although a review of all PPGs and MPGs is proposed, this is suggested as somewhat secondary and there is currently a lack of detail on this review process. As a result, commenting on how the reform will enable these specific sustainable outcomes to be achieved is problematic at this stage.

3.3 Joined-up delivery and policy frameworks.

Thirdly, there is generally a lack of detail on how to co-ordinate different tiers of strategies. Ensuring that the principle of sustainable development runs throughout all strategies, will be central to achieving sustainable outcomes at all levels.

We welcome the principle of subsidiarity which runs throughout the Paper (that at each level the only decisions taken should be those that could not be taken at a lower level). However, this has to be accompanied by a fully worked-up policy framework or context for making decisions at all levels. Without greater clarity at this stage, there is a chance of the system being slowed down, at least in the interim, as much as speeded up.

Details need to be worked up on how we can achieve both speedier decisions and more effective public participation.

4. COMMENTS ON SPECIFIC PROPOSALS: OPPORTUNITIES, CHALLENGES & WAYS FORWARD.

In developing our response to the Green Paper we have aimed to focus on key proposals which we feel may offer scope for advancing sustainable development, but where obstacles still exist and where further work is required.

4.1 Inclusion of a statement of purpose or duty for sustainable development for all strategies

The Paper fails to state explicitly the role of sustainable development in reforming the planning system. Across all decision-making levels we feel that there has been a missed opportunity to require the inclusion of **a statement of sustainable development within each plan/strategy**. This could be a simple statement that **“the purpose of planning is to deliver sustainable development”**.

To ensure delivery of sustainable outcomes at all levels, this should apply to plans at each strategic level, namely national, regional, sub-regional, local and neighbourhood.

This statement of purpose needs to be accompanied with details of how this will be achieved.

4.2 Sustainability appraisals

We strongly welcome the Green Paper’s commitment to undertake sustainability appraisals of the Local Development Frameworks (LDFs), based on the requirements of the EU Directive on Strategic Environmental Assessment.

The sustainability appraisal approach will underpin the ability of the planning system to deliver sustainable outcomes. We feel that **this approach must be extended to sub-regional, regional and national strategies**, if we are to achieve sustainable outcomes at all levels.

Sustainability appraisals also need to be applied to **individual planning applications** (especially Major Infrastructure Proposals). This will require new tools and techniques for assessing individual applications.

The SDC would welcome the opportunity to work with the DTLR on developing and implementing this guidance on appraising both strategies and major planning applications. We have recently defined our own set of **‘principles for sustainable development’** which may inform new approaches to sustainability appraisal.

4.3 Meeting national ‘sustainable’ objectives - National Planning Policy

In terms of delivering sustainable outcomes (creating sustainable communities, reducing the need to travel, conserving natural and built environment etc.) the Planning Policy Guidance (PPGs) and Mineral Planning Guidance (MPGs) notes are critical. However, the Green Paper sets out little detail on how key national objectives and targets (set out in planning guidance notes) will progress under the reform proposals.

We welcome the proposal to review national guidance notes with the view to clarifying their purpose. In particular, we welcome the focus on producing good practice guides in relation to core topics (as was the case with the revised PPG3).

We are, however, concerned that **this should not be seen as a secondary consideration** to the rest of the reform process set out in the Green Paper (which is largely procedural), as this will be essential to shaping the content of the all of the strategies as they develop.

In particular, national policy guidance will provide an important steer for informing the national

decision making context. This should take the form of a **National Spatial Development Perspective** setting out clear guidance on all aspects of development at the national level. These include national spatial guidance on road, rail, air transport, growth nodes, waste management, forestry and energy developments etc.

In light of the recent PIU Energy Review, to which we submitted a response in strong favour of renewable energy (highlighting the existing planning system as one impediment to greater uptake of this source of energy), there is an especially urgent need to review guidance note 22 on Renewable Energy.

We are therefore eager to engage in this review process to ensure guidance on sustainable outcomes can be included in this stage of the reform process.

4.4 Major Infrastructure Projects

Without a clear national policy framework it will be impossible to even begin appropriate consideration of Major Infrastructure Projects.

A National Spatial Development Perspective needs to be created to ensure strategic planning decisions are made within a sustainable development framework and not subject to party politics or short-term views.

Strong linkages will need to be developed between a national plan, regional and sub-regional plans. This chain of links is yet to be defined in the Paper.

To ensure effective participation in developing the national plan, this should be open to extensive public scrutiny and linked to democratically accountable, regional strategies (see below).

4.5 Democratic accountability in regional planning

Greater statutory powers for planning at the regional level, through the Regional Spatial Strategies (RSS), are welcomed in offering a more integrated and longer-term perspective to decision making. In particular, cross boundary resource management issues (energy production, waste management etc) are important at this level.

However, these decisions need to be taken within a democratically accountable framework. The introduction of Elected Regional Assemblies offer one means of achieving this. However, the requirement for **full participation in the production of the RSS** is not clearly stated within the Paper. Specifically, greater attention will need to be given to how the **RSS can reflect, and guide, the aspirations of the Local Development Frameworks (LDFs) within its region.**

4.6 Statutory requirement of RSS to include Duty on SD

We would advocate a requirement for plans/strategies at all levels to state a commitment to promote sustainable development. In the case of regional planning, this could be based on the **duty of wellbeing** set out in the GLA Act, which reflects the three pillars of sustainable development (social, economic and environmental need).

4.7 Linkage between regional strategies

Ensuring the delivery of sustainable outcomes at the regional level will require that the **priorities set out in the RSS are reflected in other regional strategies**, such as those on waste, energy, bio-diversity, social inclusion and transport,

and especially those produced by the RDA on regional economic development.

The linkages between the RSS and other regional strategies have not been adequately stated in the Paper and need further consideration.

4.8 Sub-regional strategies

Despite the proposed removal of county level Structure Plans, there remains a strong need for strategies at the sub-regional level. This is acknowledged in the Green Paper, although it is important that these are developed sparingly so as not to add another tier of planning unnecessarily. We propose that these should be **flexible and based on functional areas**, for example city-regions, or in some cases natural areas, such as a water catchment area, which span administrative boundaries.

The types of functions determined by sub-regional strategies also need to be further considered, along with links to their relevant RSS and LDF.

These sub-regional strategies should be either annexes or supplementary guidance to the RSS and be subject to public consultation.

4.9 Links between the Local Development Frameworks and Community Strategies

We welcome the Local Development Frameworks. They offer a more flexible and integrated approach to planning which can be more easily revised to respond to changing demands. The proposal for 'core policies' provides the opportunity to introduce a longer-term perspective to local plans, setting out the wider aspirations of the community (held within the Community Strategy).

In particular, the proposals for **criteria-based core policies** on issues such as waste disposal

and recycling, will require the planning system to consider service delivery, uptake and efficiency issues as well as traditional land-use issues.

They will also need to **take** full account of the land-use consequences of programmes (such as health, education and environmental protection) set out in the **Community Strategies**. This spatial approach to planning for services will require a mindset change in the planning profession and should build upon existing good practice.

Bringing clarity of purpose to the relationship between the Community Strategies and spatial planning is essential to the success of both Community Strategies and the LDF and building the relationship between these two strategies will be critical. This could be achieved largely through **Local Strategic Partnerships**. Further thought and guidance is required on how these bodies will engage in the planning process.

Community Strategies, linked to the power to promote wellbeing, provide a useful reference for ensuring that a commitment to promote sustainable development is contained within the LDF. We would, therefore, advocate that **sustainable development should form one of the core policies for all LDFs.**

4.10 Statement of Community Involvement

The requirement of LDFs to include in their core policies a 'Statement of Community Involvement' is strongly endorsed, but in itself will not lead to a more participatory process. Better participation, rather than more consultation, is what is required. We believe that substantial **good practice exists nationally and internationally on engaging communities in the planning process and detailed guidance needs to be worked up based on this.**

This will also need to be accompanied by **more resources, training and cultural changes within the planning profession itself.**

The Commission would be pleased to work with the DTLR on identifying and promoting this good practice.

4.11 Action plans

We support the proposal for Action Plans as we believe they provide a more integrated and engaging approach to planning. As the Green Paper identifies, these should relate to areas of change, such as urban extensions or areas requiring significant revitalisation. We view the possibility of neighbourhood plans as important tools in achieving the Government's commitment to neighbourhood renewal in the most deprived communities.

Topic-based Action Plans could offer important tools in delivering sustainable outcomes. The practical and applied approach that Action Plans entail could also equip them to address service delivery as well as land use and related issues.

Good practice already exists in terms of how to ensure that sustainability issues are properly addressed in 'Action Area' type initiatives. The Regional Development Agencies (notably the South West, through their 'Future Foundations' initiative) have been particularly innovative in this respect. Agencies such as the Countryside Agency and central Government are already helping with advice and guidance.

All this material shows how, with properly managed programmes, you can widen conventional planning considerations to include the breadth of issues key to advancing sustainable development. **Drawing together and**

promoting this existing practice and guidance will be essential to the effective implementation of Action Plans.

4.12 Planning Obligation

The proposed reform of the Planning Obligation process, set out in one of three daughter documents to the Green Paper, does (unlike the Green Paper itself) make explicit reference to sustainable development.

The introduction of a tariff system within the Planning Obligation process is welcomed in principle in terms of 'transparency' (offering greater certainty for developers and a clearer negotiating position for local authorities) and 'subsidiarity', (the rate at which it is set should be locally determined). The principle of the reform to create a system which produces positive ways to meet planning objectives (desirable outcomes), as opposed to just those which mitigate negative impacts, is also welcomed.

We strongly welcome the Government's belief that the purpose of planning obligation should be refocused to deliver sustainable development. However, we are concerned that this should **not be seen as the primary way of delivery sustainable outcomes** through the planning system.

Sustainable development needs to be at the heart of the planning system, from strategy development through to development control, and can not be seen as an add-on. **In short, planning obligation offers a mechanism which is too little too late!**

For planning obligation to be one means of effectively delivering sustainable outcomes, we need to create a framework within which the social, economic and environmental impacts of

development can be assessed. This should not only be looking at trade-offs, but also positive outcomes and synergies. **This will require new techniques for assessing and calculating the longer-term impacts of development.**

The role of planning obligation in supporting mixed communities (through proportion of affordable housing) is one way of achieving sustainable outcomes. However, we should also use this opportunity to consider more **innovative ways that planning obligation can be used to achieve sustainable outcomes**, such as supporting community funds, 'community houses' etc.

The SDC would be eager to engage with DTLR on how, in reforming the planning obligation process, innovative ways could be developed for how tariffs are calculated and applied.

4.13 Resources and skills

Many of the proposals outlined in the Green Paper may already exist in good practice. The challenge, therefore, is to make these the norm rather than the exceptions.

To achieve this, however, will require **more resources, training and changes in attitudes within both the planning profession and those groups who engage in the planning process.** The bureaucracy of the current planning system has, to some degree, stagnated the profession and offers little incentive for planners to look at the wider issues that sustainable development implies.

The proposed reform of the planning system, with its emphasis on holistic issues and the interplay between land-use and the wider aspiration of the community, does provide for more lateral, long-term and imaginative thinking. The requirement

for greater community involvement also calls for more innovative techniques for engaging with communities.

Both of these will need resources to develop the technologies and skills of the planning profession and to encourage more graduates to join. By making planning a more strategic and pro-active process, it is hoped that this in itself will encourage more people to come into the profession.

5. CONCLUSIONS:

DELIVERING SUSTAINABLE OUTCOMES THROUGH REFORM.

In conclusion, the overall philosophy behind the proposals opens the door to a consistent and effective application of sustainable development as an operational framework. The emphasis on simplifying procedures, increased subsidiarity in decision-making, and use of more flexible and integrated plans could provide a system which is more comprehensive and engaging.

However, we have also identified a series of **omissions and weaknesses** in the Paper in this respect. The absence of any substantive **understanding or treatment of sustainable development** within the Green Paper means that it fails to demonstrate how this framework could be applied as a central organising thread through all the strategies/plans.

We would therefore strongly advocate that **plans/strategies at all levels contain some statement of purpose to promote sustainable development and how this will be achieved.** To do this **sustainability appraisals should be applied to strategies/plans at all levels** (national, regional, sub-regional, local and neighbourhood)

rather than just the LDF as currently proposed, as well as major planning applications.

We also feel that the **political imperative** for this reform – namely one of speed and efficiency of procedures, rather than one of quality of the policy context and guidance within which decisions are made – creates uncertainty over how specific sustainable outcomes will be achieved. Improving planning procedures is clearly an important step in ensuring sustainable outcomes, but if the correct policy context and guidance is not in place, there is little if any encouragement for local planners to ensure that the decisions made will be sustainable.

This especially applies at the national level where a spatial framework does not currently exist to enable these decisions to be taken in a sustainable manner. Some form of **national spatial development perspective**, setting out guidance on issues of particular sustainable development significance (i.e. air travel, waste management and energy production) would be vital.

The **review of PPGs and MPGs** will be fundamental to ensuring the appropriate policy framework, and these should be seen as central to the procedural changes outlined in the Green Paper.

New techniques will also have to be introduced to consider the long-term and integrated social, economic and environmental impacts of large and significant development. This will apply to business, housing, transport and services

Greater clarity needs to be given on how the various strategies link to ensure **joined-up delivery at all levels**.

This will need to consider how the aspirations of the LDF can filter up to sub-regional, regional and even national level. **Issues over participatory**

process, especially at the regional and national level, remain vague. Bringing these grey areas into focus will be essential to ensure a system which can deliver sustainable outcomes.

The LDF and Action Plans, with their sharper, more local focus and ‘requirement’ to illustrate **community involvement** are strongly welcomed in terms of improving governance in the system. We feel that a substantial amount of **good practice already exists in enhancing community participation and efforts should be made to make these the norm rather than the exception.**

These will require **additional resources, training and capacity building within the planning profession and communities themselves**, but does not necessarily require a radical overhaul of the system itself.

We therefore feel that the Green Paper presents a useful skeleton for realigning the planning system to enable it to deliver sustainable outcomes more efficiently and effectively. The Commission, therefore, would welcome the opportunity to engage with the DTLR in fleshing out these proposals to maximise their benefit and monitor their implementation to ensure sustainable outcomes are being achieved and that significant progress is made on delivering the Government’s own sustainable development strategy.

Appendix 1: List of Commissioners

Mr Jonathon Porritt CBE, *(Chairman) Director, Forum for the Future*
Ms Maria Adebawale, *Director, Capacity Global*
Professor Rod Aspinwall, *Deputy Chairman, Enviro Group Ltd*
Ms Helen Browning, *President, Soil Association*
Cllr Maureen Child *Chair, Finance Committee Edinburgh Council*
Ms Rita Clifton *Chairman, Interbrand*
Ms Lindsey Colbourne *Lindsey Colbourne Associates*
Ms Anna Coote, *Director of Public HealthKings Fund*
Mr Ed Crooks, *Economic Editor The Financial Times*
Dr Val Ellis, *Prospect*
Ms Nicky Gavron, *Deputy Mayor, Greater London Authority*
Dr Chris Gibson-Smith *Chairman, National Air Traffic Services Ltd (NATS)*
Mr Brian Hanna, *(until recently) Chief Executive Belfast City Council*
Ms Deirdre Hutton *Chair, National Consumer Council*
Dr Alan Knight, *Head of Social Responsibility Kingfisher Plc*
Mr Walter Menzies, *Chief Executive Mersey Basin Campaign*
Professor Tim O'Riordan, *School of Environmental Sciences University of East Anglia*
Mr Derek Osborn, *Chairman, UNED-UK*
Professor Anne Power, *Professor of Social Policy London School of Economics*
Mr Charles Secrett, *Director Friends of the Earth*
Mr Richard Wakeford, *Chief Executive Countryside Agency*
Ms Jess Worth, *People and Planet*
Mr Graham Wynne, *Chief Executive RSPB*
Mr Raymond Young, *Board member for Forward Scotland*

APPENDIX 2 - APPROACH TO ASSESSING GREEN PAPER PROPOSALS

In developing our response to the Planning Green Paper we have assessed its overall approach and key proposals against four principles of sustainable development which we have identified as central to achieving a planning system which can deliver sustainable outcomes. These are:

- **Resource Management:** This is central to planning which governs key finite resources – namely land. Ensuring that resources continue to be available to meet future needs is the essence of sustainable development. Integrated policy as much as effective procedures will be vital in this respect.
- **Long-term thinking:** Planning is ultimately about the future. Many strategic planning issues, such as energy supply and waste management, present impacts that are significantly longer than the period covered by most current plans. Taking account of longer-term impacts of developments will be fundamental to achieving sustainable development.
- **Governance:** By this we mean the arrangements that determine who is involved in the decision-making process and how this process is managed. Within the planning system there is an assumption that ‘involvement equals delays’. However, sustainable development is based on a pre-requisite of democratic accountability and effective participation. Ensuring an adequate, but unimposing, degree of Governance at all levels will be essential to reforming the planning system.
- **Integration:** Ensuring a fully integrated planning system enables us to not only consider trade-offs but also synergies and linkages between social, economic and environmental impacts.

A brief summary of how the proposals set out in the Green Paper contribute, or not, to the advancement of these principles of sustainable development is presented out below. This sets out the strengths and opportunities, gaps and challenges and key implications of number of proposals in relation to each principle. This analysis forms some of the basis for comments on overall approach of the Green Paper and discussions on specific proposals set out in sections 3 and 4 of the main report.

Appendix 2 - Planning Green Paper Assessment against four key Sustainable Development Principles

Principle	Strengths & Opportunities	Gaps and Challenges	Implications
Resource Management	<ul style="list-style-type: none"> Resource management issues could benefit from clear and effective guidance at the national level (e.g. energy generation from renewable sources). At the Action Area level there could be scope to specify new development (e.g. housing) to illustrate resource efficiency. Sustainability Appraisals of plans/strategies and applications would call for greater resource management. 	<ul style="list-style-type: none"> Concern over reduction in scope to debate MIPs could have implications on resource management (i.e. number, location of airports). Removal of the county level plans, but retention of transport decisions, could have implications for cross-boundary resource management issues. Lack of comment on how LDF and Action Plans will take account of resource management. Absence of detailed policies in many areas covered by the LDF could be harmful to some resources where their accumulative impact could be significant. Business Planning Zones (where only minimal environmental apply) may present concerns. 	<ul style="list-style-type: none"> Need to develop further how county level can ensure effective resource management in light of their transport role. Develop clearer links with the Community Strategy on how resources can be managed at local level.
Long – Term thinking	<ul style="list-style-type: none"> MIPs to be dealt with in way which balances national, strategic and local issues RSS will have to set out strategic decisions in longer time horizon LDF offer clear long-term core visions Planning Obligation emphasis on SD should bring a more long-term perspective. 	<ul style="list-style-type: none"> Decision not to include Third Party Rights of Appeal led to only those with land, property or local interests (often more short-term) being engaged. Parliamentary determination of MIPs may be subject to party politics and possibly short-term goals. Over-reliance of SD in Planning Obligation may be too little, too late. 	<ul style="list-style-type: none"> In theory, reform could allow for specific, deliverable steps to be made in the short term (speedy permissions) within a framework/context of a longer-term vision. However, this will require overall policies (framework) at the national level, as with regional and local.
Governance	<ul style="list-style-type: none"> Theme of more, better and earlier participation runs throughout the Green Paper. Proposal for greater professional training, skills and standards to promote and develop participative processes. 	<ul style="list-style-type: none"> In principle the Paper sends out a message of ‘involvement equals delays’ with the higher the level of decision (strategic importance) the less the opportunity for participation. MIPs, in particular, offer no scope for local determination on an individual basis. At the regional level, the prerequisite is for Elected Regional Assemblies, but this still presents the problem of whether elected members are representing their region or their constituency. Although indicated, there is no clarity on how wider participation can be achieved at the regional level. Outlined criteria for involvement (for example, some form of property right) may be seen as exclusive. 	<ul style="list-style-type: none"> Plenty of recent, positive practice exists on participatory processes that should be identified and highlighted as good practice (e.g. deliberative approaches). A cultural change in the planning system (officer and member level) will need to take place to ensure spread of good practice. Better participation, rather than more consultation is required and this will need to be considered for each tier. At national level, new methods of engagement are especially required.
Integration	<ul style="list-style-type: none"> Proposal to review PPGs should give guidance on achieving sustainable outcomes. Proposal to apply European Sustainability Appraisals to LDF Action Plans, with their emphasis on masterplanning and fuller participation, could widen scope of traditional landuse planning. Proposed link between LDF and Community Strategies may also broaden scope of Plans to consider non-landuse issues (air quality etc.). ‘Sustainability aspirations’ contained within the reformed Planning Obligation could broaden application. 	<ul style="list-style-type: none"> Paper does not appear to fully appreciate the complexity of resolving conflicting of interests. Proposals to integrate sustainability into LDF do not alter radically from existing arrangements in Dev. Plans which currently, do little in this respect. 	<ul style="list-style-type: none"> Sustainable criteria needs to be more central to the decision making process. There should be a requirement for ‘contribution to SD as the determining criterion’ in decision making. This will require Sustainability Assessment in both plan/strategy development and determining major applications.