

1a disagree

1b

Paragraph 9: We welcome the use of the Brundtland Commission's definition of the term "sustainable development", but by paragraph 13, the Framework goes on to use the terms "sustainable development" and "sustainable economic growth" interchangeably. We believe that they are currently fundamentally different concepts and that, until we make the transition to a genuinely low-carbon economy, they remain in conflict with one another: growth in today's materially and energetically intensive economy implies growth in the rate of non-renewable resource depletion and an acceleration of greenhouse gas emission rates, which absolutely compromise the ability of future generations to meet their own needs. We are concerned that the notion that "without growth, a sustainable future cannot be achieved" could lead to a planning system that lacks any statutory obligations or incentives for genuinely sustainable development (i.e. as per the Brundtland Commission definition).

We agree in principle with the statement in paragraph 11: "There is no necessary contradiction between increased levels of development and protecting and enhancing the environment", but remain concerned that there is no definition of what constitutes a development that is "planned and undertaken responsibly", or any details about how this might be monitored, measured or enforced. Indeed, paragraph 14 goes on to describe how LPAs' default position should be to allow development in as many circumstances as possible. The only apparent environmental control being the Birds & Habitats Directives (paragraph 16). We believe that this affords too little protection for ecological services & capital, and too little incentive for truly sustainable development.

Paragraph 14 also states that policies (permitting development) should apply unless the "adverse impacts of allowing development would significantly and demonstrably outweigh the benefits when assessed against this Framework taken as a whole." Given the strong emphasis on the need to support economic growth, we are concerned that the Framework may fail to balance economic, social and environmental aspects of a case equally, and that, for example, severely adverse social or environmental impacts of a proposed development could fail to outweigh moderate economic benefits.

Paragraph 19: "Decision-takers at every level should assume that the default answer to development proposals is "yes", except where this would compromise the key sustainable development principles set out in this Framework". As discussed, we believe the sustainable development principles set out in this Framework are flawed.

Paragraph 19: We welcome the recognition of the potential for multifunctional landscapes and would like to see the Framework go even further to include an integrated "residential, productive & ecologically regenerative" land use category that could encourage diversified rural enterprises, and sustainable agricultural & forestry activities. We welcome policies that enable the reuse of resources and the encourage the use of renewable resources & energy. We also welcome the proposal to manage growth patterns to make maximal use of sustainable transport infrastructure.

2b

Paragraph 49: We are concerned that affluent and well-resourced communities will make more effort - and have more available time - to engage with the process of developing neighbourhood plans than deprived communities. Consequently we can foresee much more comprehensive and restrictive local plans in affluent communities, and relaxed planning controls in poorer

neighbourhoods. We are concerned that this will result in “undesirable” development such as major infrastructure projects being disproportionately clustered into areas of existing social and economic deprivation, leading to further deterioration of such local environments.

We are also concerned that the shift in power from qualified but unelected professionals to unqualified local people could result in the emergence of local "NIMBY charters". This in turn may well stymie innovative development and cutting-edge architecture & design in some areas.

4a

The provider should be independent, not-for-profit and overseen by Government.

Up to question 12a