

**RE APPLICATION FOR PLANNING PERMISSION AT DUNSFOLD
AERODROME BY DUNSFOLD PARK LIMITED**

Planning Authority's Reference WA/2008/0788

Planning Inspectorate Reference APP/R3650/A/08/2089143/NWF

**Statement of support on behalf of Friends of the Earth England
Wales and Northern Ireland**

Introduction

1. I am Dr Hugh Ellis, and I am the national planning advisor to Friends of the Earth England, Wales and Northern Ireland – which in this statement I refer to as Friends of the Earth “UK”. I have held this post since 2000. I hold a Diploma in Town Planning, a Bachelor of Arts (with Honours) in Urban Studies and a Doctorate in Land Use planning from the University of Sheffield. I am a member of the Town and Country Planning Association policy council and hold a part time position with TCPA as advisor on planning and climate change.

Relevant experience

2. In 2006 I co-authored the joint publication on the case for a Planning Policy Statement on climate change and worked on secondment to the Department of Communities and Local Government in the early development process of the current PPS 1 Supplement on Climate Change. My role in Friends of the Earth UK has led to close involvement with the development of national policy including PPS 1, 4, 6, 9 and 22. I have also been closely involved in the passage of the 2004 and 2008 Planning Acts, including providing evidence to select committees and working closely with parliamentarians on both the Commons and Lords committee stages of both Bills. Friends of the Earth UK has been interested in this process from a climate change, civil rights and environmental justice perspective.
3. I was first made aware of the proposal by the Rutland Group for an exemplar, mixed use development at Dunsfold Aerodrome by Guildford and Waverley Friends of the Earth in September 2006. This local group

has an excellent reputation for measured and principled engagement in local planning issues.

4. I have focused on reading the material before this Inquiry, which is particularly relevant to climate change issues.

Friends of the Earth England, Wales and Northern Ireland

5. Friends of the Earth campaigns for sustainable development and for solutions to environmental problems to make life better for all people, now and in the future. In the UK it has over 100,000 supporters, 170 staff and 240 local groups such as the Guildford and Waverley local group, and is represented in over 70 other countries.
6. Friends of the Earth UK does not normally support individual developments and has never done so in my experience. However, the exemplary sustainability standards being proposed by the Rutland Group, including zero carbon development, demonstrate exactly the kind of positive response to the threat of climate change which the organisation has been promoting.

Climate Change

7. Climate change is the most pressing environmental, economic and social issue facing modern society. Only urgent and lasting cuts in carbon emissions can achieve climate stabilisation.
8. Climate change is a vital priority of the planning system. PPS 1 and the PPS 1 Supplement on Climate Change both reinforce the imperative to use spatial planning to secure low and zero carbon development.
9. The Waverley Borough Council case for refusal does not appear to me to adequately address climate issues. Instead it bases its case for refusal on a development plan which, because of its age, takes little or no account of climate change issues. The Council's approach of 'wrong time wrong location' for me dangerously ignores the urgency of the need for the planning system to deal with climate change now.
10. The carbon performance ambitions of the proposal grapple with the complexity of building performance and operational use and offer a carbon performance which is in my view exemplary in relation to current housing development and well in advance of government aspirations.

I want to say a word about the interface between planning and the planning system.

11. The impact of climate change has already been made clear in Mr Bullock's proof¹. The Copenhagen International Congress on Climate Change, which met in March 2009, reinforced the overwhelming scientific consensus about the potential catastrophic cost of inaction. The conference revised the scale of dangerous climate change so that the probable scenarios for sea level rise were increased from around 50 to 60 cm by the end of the century to between 1 and 1.2 metres. I can find no historical parallel (blitz reference).
12. Friends of the Earth UK has commissioned Tyndall Centre for Climate Change Research, to examine the first report (2008) of the Committee on Climate Change and set up as a result of the Climate Change Act, and the options and implications for the carbon budgets and the 2020 climate target. The report considers emissions reduction pathways for the UK in the context of global emissions trends, and recommends a 2020 target of at least 42% for the UK without any use of carbon trading to meet this target. That figure is extraordinarily ambitious and in excess of the figures in the South East Plan and planning policy on climate change with even this likely to fall short of the 2 degrees maximum global warming commitment of many developed countries. (Tyndall/Friends of the Earth 17th March 2009)²
13. With 40% of the UK emissions arising directly from the built environment the construction of low or zero carbon development is vital if emissions are to be reduced.
14. Climate change remains one of the Government's key priorities for the planning system. The legal basis for planning contains to my knowledge two statutory duties on policy, and they are to consider sustainable development and climate change in the preparation of plan policy (Planning and Compulsory Purchase Act 2004 (Section 39) and the Planning Act 2008 (Section 181). The presence of climate change on the face of the new Planning Act is clearly intended to signal its distinctive importance in planning decision making.
15. Planning Policy Statement (PPS) 1 makes clear the planning system obligation by '**addressing causes and potential impacts of climate**

¹ See Bullock Main Proof paragraphs 4.12-4.19

² See appendix 1

change' (PPS 1 2006 Para 13). PPS 1 and the PPS1 supplement on climate change were explicitly designed to have a transformational affect on the planning process so that the consideration of carbon was at the heart of decision making. It is vital to say the intent is to go beyond PPS1 (which was) published because Local Government was not making fast enough progress.

16. Paragraph 7 of the PPS Supplement on Climate Change states:

'In making this contribution to a prosperous economy and to a high quality of life for all, planning has a key role in helping to tackle climate change. Used positively, it has a pivotal and significant role in helping to:

secure enduring progress against the UK's emissions targets, by direct influence on energy use and emissions, and in bringing together and encouraging action by others;

deliver the Government's ambition of zero carbon development; shape sustainable communities that are resilient to and appropriate for the climate change now accepted as inevitable;

create an attractive environment for innovation and for the private sector to bring forward investment, including in renewable and low-carbon technologies and supporting infrastructure; and

capture local enthusiasm and give local communities real opportunities to influence, and take, action on climate change.'
(PPS: Planning and Climate Change CLG 2008)

17. The guidance goes on to set out site selection criteria in Paragraph 24 and stresses the opportunity for local planning authorities to move faster on housing standards than national Government requirements. Certainly in my view Dunsfold meets and exceeds [these]
18. In considering the application it is important to note that Waverley Borough Council has based its objection on a number of policies included in the 2002 local plan that have been superseded by national policy on climate. I note that paragraph 11 of the Planning Policy Statement Supplement ***'Planning and Climate change' (CLOG Dec 2007) states: 'In considering planning applications before RSSs and DPDs can be updated to reflect this PPS, planning authorities should have regard to this PPS as a material consideration which may superseded the policies in the development plan' (Para 11).*** Given the age of the existing development plan I suggest that the policy requirements of the

PPS on Climate Change should outweigh those of the adopted development plan (see also paragraph 68 of PPS 3).

The benefits of the proposal for Dunsfold Aerodrome in relation to meeting climate change targets

19. I have read the evidence on sustainability by Dunsfold Park's experts (Owen/Guthrie/Gerrard), which I think is impressive. It is evident that this development would be one the UK's most sustainable settlements, and certainly one of the most advanced in the planning process and that point is key in terms of taking action on climate change. The proposal is an unprecedented opportunity to deliver the objectives of PPS1 Climate Change Supplement and the draft PPS on Eco-Towns whilst at the same time addressing the urgent affordable housing need in Waverley. I'm personally not aware of any comparable proposal this far advanced in the planning process.
20. The Application offers a zero carbon housing development constructed to level 4 but to code level 6 for energy through the provision of on-site combined heat and power. It will also be built to code level 6 for water.
21. There are similar ambitions for zero carbon commercial buildings including both sustainable drainage and water recycling. It includes the first large scale wood biomass chip scheme in the UK for zero carbon domestic and commercial energy for an entire community. I am impressed overall by the holistic approach to Dunsfold Aerodrome and its overall emissions that ?????, new development must achieve carbon reduction. The provision of community allotments and a community orchard demonstrate that the developer recognises that a contribution can be made to carbon reduction by providing land for local food production. This is precisely the kind of benefit to the community, which marks this out as exemplary sustainable development.
22. It is clear from the evidence of Professor Guthrie that the proposed development is an environmental exemplar, meeting and exceeding the standard set out in the Government's own Eco-towns draft policy document. The comprehensiveness and vision of the development is the kind of scheme, which is vital to fulfilling the Government's ambition for 'low and zero carbon development' (Planning Policy Statement: Planning and Climate Change 2007).

Transport

23. In assessing the broad location merit of the Dunsfold application it is important to acknowledge the challenge of sustainable transport patterns. Waverley Borough Council focused on this issue in its reason for refusing the application and claimed that this made the application incompatible with PPS 13 on transport.
24. Bus services with permanent funding through income from commercial buildings going into the community land trust are an important feature of this development.
25. The current commercial uses on the site already generate traffic. The enhancement of employment opportunities combined with housing means that this application has the potential to be genuinely self sustaining. The merit of a mixed use development such as this means that it provides the opportunity for walking and cycling to work. This provides at least as much opportunity for reducing the need to travel as does an urban extension with little or no employment within walking distance. I think that is a critical planning consideration.
26. Once again the contention that this scheme is in breach of Planning Policy Guidance 13 is not credible. There seems to be little consideration of the applicant's commitment to pioneering transport proposals - both to reduce powered transport demand and to create a modal shift from cars to walking, cycling and public transport, with a new network of zero carbon buses, car access charges for residents and workers, car restricted centre, extensive network of bicycle routes (including to Cranleigh), and comprehensive travel plans.

Conclusion

27. The high environmental performance of the Dunsfold proposal offers unique opportunity to develop the only significant previously developed site of any size available in Waverley in a way which avoids damage to existing environmental designation and which delivers on the need to mitigate climate change.
28. When all the measures the applicant is offering in this development are taken into account the proposal provides an exemplar for development as described in paragraph 7 of PPS1. The development is also in line with national planning policy and in particular PPS 1 Climate Supplement PPS 3 and the draft PPS on Eco-towns.

29. Contrary, in my view, to the conclusions of Waverley Borough Council, I believe that the application is in line with latest up-to-date national policy, in particular the obligations on climate change, and that these considerations plainly have more weight than the existing local plan. If, as I believe is clear from Government guidance, climate change is a critical in planning considerations, then it is logical that a scheme like this which meets and exceeds the Government ambition on low carbon should receive favourable consideration.

30. Climate change can only be tackled by real changes in the operation of society. Some of these changes require high level action on renewable energy. However, there is an urgent need for low carbon exemplars in the UK. Dunsfold is not only an example of a low carbon development proposal but it is to my knowledge the best advanced. So long as the aspirations and environmental performance of the application are properly secured by the S106 Unilateral Undertaking, it would make the scheme a vital step in the ultimate goal of achieving a vibrant low carbon economy. For this reason as well as the compatibility of the scheme with national planning policy Friends of the Earth strongly urges that the appeal be upheld.

Dr Hugh Ellis

24 March 2009