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● Hugh Ellis on rediscovering the lost utopian tradition in town planning

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Hugh Ellis on the costly neglect of the utopian tradition, pages 375–380. Cover illustration by Clifford Harper.  
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# end of an era



Having had its first reading in the House of Commons on 11 May 2022, the Levelling-up and Regeneration Bill finally received Royal Assent and became an Act on 26 October. What is desperately disappointing for the TCPA is that, despite a heroic effort by Lord Crisp and the staff team to get healthy homes amendments added when the Bill was in the House of Lords, the amendments were subsequently removed in the House of Commons. This means that, while the government has set out levelling-up missions on both health and wellbeing, there are no references or specific measures aimed at tackling health inequalities in the new legislation.

One small positive to be taken from the final stages of the passage of the Bill through Parliament was, however, a concession in relation to climate change. While it is not as strong as we had been pushing for, the Secretary of State must now 'have regard to the need to mitigate, and adapt to, climate change' when preparing a policy which is to be designated a National Development Management Policy, or in modifying one.<sup>1</sup>

As noted in *Town & Country Planning* previously, the government's opposition to the healthy homes amendments mainly centred on its argument that the issues were being tackled through other policy and legislation. We continue to fundamentally disagree with that but now must look ahead to the expected consultation on the revised National Planning Policy Framework and associated National Development Management Policies.

In more positive news, the TCPA welcomed the announcements during party conference season in relation to commitments to new communities. The Liberal Democrats set out a policy which commits to 'building ten new garden cities to tackle the housing crisis',<sup>2</sup> and the Leader of the Labour Party used his conference speech to set out a vision that includes building 'the next generation of Labour new towns'.<sup>3</sup>

As we noted in our response to the Labour announcement, a new suite of New Towns would offer the potential to deliver genuinely affordable homes alongside economic growth and the community facilities and infrastructure needed to create thriving, sustainable places. The process by which locations are identified and sites are consented will of course be vitally important. Communities must have a real say in their future, and a national spatial plan will be required to determine growth areas within which local authorities are supported in working together to define the precise scales and locations of the New Towns. This requires a holistic approach that factors in existing and planned infrastructure and environmental limits, housing need, and the need to rebalance the economy.

We will continue to urge all relevant political parties to learn the lessons from the past and present delivery of new communities—including through working with the TCPA's New Communities Group. Very detailed conversations on these issues were held with politicians ahead of party conferences, and will continue, we expect, throughout the run-up to the next general election.

While we welcomed the announcement on New Towns, I would not want to pretend that everything in the Labour Leader's speech was positive. Many of us are concerned about the morale of planners, especially in the public sector. For too long government ministers have argued that the planning system is a barrier, and we have argued that there needs to be a change in that narrative, and that planning needs to be seen as a positive tool. Sadly, there is still much to do to win that argument with all political parties. In his speech,<sup>4</sup> Keir Starmer said that: '*There is one barrier so big, so imposing that it blocks out all light from the other side. A blockage that stops this country building roads, grid connections, laboratories, trainlines, warehouses, windfarms, power stations. An obstacle to the aspirations of millions—now and in the future—who deserve the security of home ownership. A future hidden by our restrictive planning system [...] we must bulldoze through it.*'

Finally, while *Town & Country Planning* is not an in-house magazine for the Association I want to use my final column of 2023 to announce that sadly



Nick Matthews will be retiring from his role as Editor at the end of the year. This means that this is officially his last edition in charge—although as work is already under way on the first edition of 2024, he will have a hand in its production. It is very hard to pay tribute to all of the work that Nick has undertaken during his incredible 35 years at the TCPA. Coming into post in December 1988, his first edition as Editor was the January 1989 issue, which is available to see on our digital archive.<sup>5</sup> Since then, he has been the one constant at the TCPA in a whirlwind of changes to planning, which spanned nine prime ministers, too many housing ministers to count, and a lot of planning legislation!

Readers who know Nick will understand how uncomfortable these short paragraphs about him will make him. I will therefore not say too much more, other than that we must mark this end of an era and I am sure readers of *Town & Country Planning* will agree that Nick has been an exceptional Editor and he will be a hard act to follow! I, on behalf of everyone involved in the Association, currently and throughout the last 35 years, thank him for all that he has done.

● **Fiona Howie** is Chief Executive of the TCPA.

### Notes

- 1 Section 94 of the Levelling-up and Regeneration Act 2023. [www.legislation.gov.uk/ukpga/2023/55/enacted](http://www.legislation.gov.uk/ukpga/2023/55/enacted)
- 2 The motion which was passed ('Tackling the housing crisis') is available from the LibDem website, at [www.libdems.org.uk/conference/motions/autumn-2023/f31](http://www.libdems.org.uk/conference/motions/autumn-2023/f31)
- 3 Coverage of Keir Starmer's speech is included in R Booth and K Stacey: 'Housing developers could override local objections under Labour, says Starmer'. *The Guardian*, 11 Oct. 2023. [www.theguardian.com/politics/2023/oct/11/labour-keir-starmer-pledges-to-build-new-towns-utilising-grey-belt-areas#:~:text=Starmer%27s%20plans%20would%20involve%20a,wasteland%20and%20unused%20car%20parks](http://www.theguardian.com/politics/2023/oct/11/labour-keir-starmer-pledges-to-build-new-towns-utilising-grey-belt-areas#:~:text=Starmer%27s%20plans%20would%20involve%20a,wasteland%20and%20unused%20car%20parks)
- 4 The transcript of Keir Starmer's Labour Party Conference speech is available at <https://labour.org.uk/updates/press-releases/keir-starmer-s-speech-at-labour-conference/>
- 5 See <https://archive.tcpa.org.uk/archive/journals/1980-1989/1989/january-march-72>

The TCPA's **vision** is for homes, places and communities in which everyone can thrive. Its **mission** is to challenge, inspire and support people to create healthy, sustainable and resilient places that are fair for everyone.

Informed by the Garden City Principles, the TCPA's strategic priorities are to:



Work to secure a good home for everyone in inclusive, resilient and prosperous communities, which support people to live healthier lives.



Empower people to have real influence over decisions about their environments and to secure social justice within and between communities.



Support new and transform existing places to be adaptable to current and future challenges, including the climate crisis.

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- Affordable housing
- Community participation in planning
- Garden Cities and New Towns
- Healthy Homes Act campaign
- Healthy place-making
- New Communities Group
- Parks and green infrastructure
- Planning reform
- Planning for climate change

The flooding caused by Storm Babet was just a taste of the new normal—and further proof of the need to rethink our approach to risk and resilience, say **Celia Davis** and **Hugh Ellis**

# rethinking risk in the wake of storm babet



Many of us will have felt a growing level of unease and vulnerability as we watched the trail of devastation caused by Storm Babet unfold across the UK at the end of October. Many rivers burst their banks and water levels broke records in some areas, including Newry in Northern Ireland, the River Derwent in Derbyshire, and the River Idle in Nottinghamshire.<sup>1</sup>

During the UK's latest extreme weather event fuelled by climate change, over 2,100 homes were flooded,<sup>2</sup> and their residents will face months of stressful repairs, restoration, and financial worry. Hundreds of people had to be rescued from their homes, and hundreds more were told to evacuate. Tens of thousands of people were affected by power cuts or caught up in travel chaos. And most tragically of all, seven people lost their lives.

The headlines in the immediacy of flooding events bring to the forefront the devastating human cost of climate change, but in the aftermath lessons must be learnt about our resilience and ability to cope with events such as Storm Babet—which we know will only become more intense and more common.

The small town of Brechin in the east of Scotland made headlines when residents were evacuated as the River South Esk burst its banks with such force as to overtop, and then breach, flood defences. The town's flood prevention scheme was completed just eight years ago at a cost of over £16 million<sup>3</sup> and included 1.5 kilometres of embankments and flood walls up to 1.8 metres high.<sup>4</sup> The scheme was designed to withstand a 1-in-200-year flood event (or, in simpler terms, a flood event with an annual probability of 0.5%).

Transport infrastructure was brought to a halt across the country as roads and train lines were deluged with water. Trains between London and Bristol were cancelled, and services halted at Swindon, owing to flooding on a stretch of railway line that had received millions of pounds of investment to upgrade drainage in 2017.<sup>5</sup>



mac77

Newly built homes in a development area in Sandiacre, Derbyshire, subject to floods caused by Storm Babet



Peter Shaw/Stock

**Resilience measures saved Matlock from catastrophic flooding, but our approach to flood management is increasingly ad hoc**

Derbyshire was one of the worst-hit parts of the country, including severe flooding in the village of Sandiacre, where around 200 homes were flooded when the River Erewash burst its banks.<sup>6</sup> Drone footage captured the extent of the flooding, and right in the centre of the worst-affected area is a construction site at which 53 homes are being built by Wade Properties Investments Ltd.<sup>7</sup> Most of the site is in flood risk zone 2, with peripheral sections in flood zone 3. The Flood Risk Assessment of the development concluded that the standard of protection afforded by the existing flood risk defences (designed for a 1-in-100-year flood scenario accounting for climate change), combined with flood resilience measures (primarily floor levels raised by 300 millimetres), would make the development safe.<sup>8</sup>

What is interesting is that the assessment tested a precautionary-design flood (1-in-100-year flood event with 30% climate change allowance) and found that this would require raised floor levels of over 1 metre on parts of the site. This mitigation was deemed 'impractical in terms of access issues to the new dwellings and the potential floodplain displacement'.<sup>9</sup> This leaves the planned properties reliant on resilience measures which, going by the images of the recent flooding, may not be sufficient to protect the properties if such an event were to happen again.

Erewash Borough Council has responded to the flooding events by declaring a climate emergency, perhaps a sign that the council will now prioritise climate change—a policy area that has been lacking meaningful action in recent years.<sup>10</sup> But that

is unlikely to influence the fate of the catastrophically flooded permitted site. What is much more likely to influence the outcome of this case is the market. Will those houses be insurable? Will anyone want to buy one?

These three examples raise a fundamental question about whether planning and development processes adequately anticipate the severity and likelihood of future flood events. The design of flood defences in Brechin was unable to anticipate levels of floods that occurred in less than ten years,<sup>11</sup> and it seems that in future a more precautionary approach that overestimates impact will be required to keep people safe.

Yet the government appears to be underplaying the issue, with the then Environment Secretary Thérèse Coffey stating that the storm was hard to predict because it came from the east<sup>12</sup>—positioning it as an anomaly rather than the 'new normal'. There is no denying that a combination of factors contributed to truly exceptional levels of rainfall, breaking records that go as far back as 1891<sup>13</sup> and triggering flood warnings in places in the east of the country that are generally less susceptible to storm events.<sup>14</sup> But many of the circumstances that influenced the storm's trajectory are well rehearsed climate change impacts: a warming ocean leading to the air holding more moisture,<sup>11</sup> an increasing unpredictability in the position of the jet stream, and unseasonable high pressure over parts of Northern Europe.

There is no doubt that resilience has improved in many places—Matlock in Derbyshire was spared



catastrophic flooding by a combination of managing the Derwent Valley dams and the use of temporary pumps. The Environment Agency estimates that 96,000 homes were protected from flooding by flood management measures.<sup>2</sup> However, our approach to flood management is increasingly reliant on ad hoc emergency measures rather than designing in intrinsic community and property level resilience. The more ad hoc and complex the response, the more risks there are—a position made much worse by the failure to invest in flood defence maintenance.<sup>15</sup>

In the aftermath of Storm Babet, the media interest will diminish, but interest in building resilience must stay the course. Babet was just a taste of the new normal which will damage our economy and endanger people in all parts of the UK. We need to rethink our approach to risk and resilience. The storm may have highlighted some specific vulnerabilities and areas where flood defences need to be rebuilt and improved, but there is a wider need to consider how the increasing regularity of extreme flood events is plugged into the design of development and infrastructure.

This needs to begin with an honest evaluation of risk which deals with the worst-case scenario and designs around that knowledge, rather than justifying deviation from those eventualities on the basis of complex probabilities which leave communities bewildered and disempowered. The National Infrastructure Commission's latest assessment<sup>16</sup> is clear that there is much to be done to improve the resilience of properties and infrastructure networks to flood risk, and suggests that a risk reduction target which takes account of climate change is required to drive action. The immediate challenge for those communities that bore the brunt of the impacts of Storm Babet is focused on recovery, but we must think long term about increasing resilience to these events, which are now part of life in the UK.

● **Celia Davis** is a Projects and Policy Manager and **Dr Hugh Ellis** is Policy Director at the TCPA. The views expressed are personal.

## Notes

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- 9 *Flood Risk Assessment. Welbeck House, Sandiacre*. Hilson Moran, Mar. 2021, p.22. <https://register.civicacx.co.uk/Erewash/Planning/Details/ShowDetails?id=18721&pcid=&dpid=DocumentsPage>
- 10 A recent review of local authority commitment to climate action by Climate Emergency UK rated Erewash Borough Council near the bottom of district-level councils in England — see <https://councilclimatescorecards.uk/scoring/district/>
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- 16 *Second National Infrastructure Assessment*. National Infrastructure Commission, Oct. 2023. <https://nic.org.uk/studies-reports/national-infrastructure-assessment/second-nia/>



# wedge issues, winning votes, and car drivers



There are two major political events looming in the UK, and they are leading to an interesting turn in tactics by the Conservative Party, incidentally trailing badly in the polls for both. The London mayoral election will be held in May 2024 and the UK general election at the latest by January 2025 (the current electoral rules are that a general election has to be held at most five years after the preceding election). A tactic that we see emerging in contemporary political strategy in the UK, drawing on decades of practice from the US, is to create 'wedge issues'. These are topics with a controversial and divisive nature, typically with a populist theme. The aim is to attract voters from the opposition or to raise an issue of internal dissent that may help to reduce support for the opposition, including through disillusionment.

There are famous examples from the US involving immigration, minimum wage levels, same-sex marriage, abortion, and stem cell research. The general approach is to raise the wedge issue with the opposition voters and then align with the dissenting faction.<sup>1</sup> This strategy explains some of the recent actions of Prime Minister Rishi Sunak.

In his Conservative Party Conference speech in October, he cancelled the northern section of the High Speed 2 (HS2) rail link, from Birmingham to Manchester, on an already-curtailed project. The given rationale was rising costs and lengthening timeframes, with the cancellation estimated as saving £36 billion, to be spent on 'hundreds of new transport projects in the North and Midlands'. These are not fully specified, but an initial list included highway capacity improvements and 'the resurfacing of roads across the country'.

HS2 has many detractors, and is massively over budget, rising from an initial estimate of £37.5 billion to the latest estimate of £100 billion plus. It has been in planning for years and is running late. It is a complex project to deliver, not least in the face of

changing political priorities over time, hence the difficulties in project management. Indeed, much of the cost overrun can be attributed to dithering national politics, introducing various reviews, delays and changes in specifications.

But, in the end, electrified high-speed rail (HSR) is the only way to reduce long-distance car travel and short-haul air. It will need to be built, at some stage, to contribute to reduced transport carbon dioxide emissions. Ask most commentators in France, Spain, Japan, China or elsewhere with HSR systems, and usually they are seen as useful tools to reduce the environmental impact of long-distance travel, while improving connectivity between distant urban centres.

Most likely, there will need to be further HSR networks across northern England and to the South West and Wales, alongside tram and suburban rail schemes in the major cities and regions. It is much cheaper and more effective, in terms of the planning and engineering resources required, to build these projects consequentially, and to progress incrementally and consistently from today. The announcement from Rishi Sunak, however, was not concerned with these issues. It was simply an attempt to attract the potential interest of the owners of nearly 40 million vehicles registered in the UK.<sup>2</sup> What a wonderful wedge issue: perhaps many of these drivers will not support public transport investment, particularly when the route will not impact them and they are unlikely to use it?

This also explains the rather odd collection of further exhibits from the transport world—relating to the London Ultra-Low Emission Zone (ULEZ) expansion, low-traffic neighbourhoods, 20 mph speed limits, and 15-minute cities. The Department for Transport has raised all of these in their rather preposterous *The Plan for Drivers*,<sup>3</sup> presumably at the request of the governing party. All are introduced as potential wedge issues, as environmental interventions that might upset the car driver.

Moving to the London mayoral election, a leaflet recently popped through my letterbox. It was from the Conservative mayoral candidate for London, Susan Hall. The context is that the Conservatives have selected a seemingly weak candidate, with no chance of beating the Labour candidate and incumbent Mayor of London, Sadiq Khan.



**The Plan for Drivers and the campaign against the ULEZ expansion—the aim is to attract voters from the opposition who may prefer driving their cars relative to a range of environmental interventions that are aimed at reducing car travel**

However, the same strategies are being followed, with Susan Hall actually a well practised populist candidate, with a history of pursuing wedge politics.

She is campaigning on two fronts. The first is to stop ULEZ, in the hope that some voters are not interested in climate change and will prefer to drive their cars and vans than protect the environment, or indeed improve air quality and health. The second is the old Tory trope of safety on the streets. Susan Hall also has a record of ‘liking’ tweets on X/Twitter quoting Enoch Powell—‘It’s never too late to save your county’ and ‘It’s never too late to get London back’.<sup>4</sup> She has similarly described the Notting Hill Carnival as ‘dangerous’ and that the black population has ‘a problem with crime’.<sup>5</sup>

This is dog-whistle politics (named after ultrasonic dog whistles, which are audible to dogs, but not humans). The idea is to raise issues attractive to some voters, hoping that others will not hear or will overlook them. Susan Hall’s X/Twitter account has been reported to have ‘apparent endorsements of Donald Trump, including his claim that he lost the presidential election in 2020 to Joe Biden because of voter fraud’.<sup>6</sup> Susan Hall and her campaign team

have tried to back-pedal, explaining that these are not her real views, only a ‘like’ of other views, and that she ‘engages with many people on Twitter without endorsing them’.<sup>6</sup>

Well, I suggest that she knows what she is doing, positioning her populist campaign in the hope of raising the hackles of the owners of 2.6 million registered cars in London, alongside attracting a few racist bigots.

On the ULEZ expansion, Susan Hall states, in her promotion leaflet, that ‘for too long, we’ve had a mayor who ignores us’, that the ‘Conservative candidate for Mayor of London is on our side’ (underlined), and that ‘I’ll scrap the ULEZ expansion on day one’ (mentioned twice, in case you missed the first instance).

There seems to be little regulation of what goes into political brochures—there is no need for balance, such as a requirement to mention climate change and social equity when discussing ULEZ or other transport interventions. ULEZ is actually not ‘ultra’ at all—it sets an incredibly low bar, with only very polluting vehicles being charged (an estimated 10% of the vehicle fleet). If you have an old, large

diesel car, then it will affect you—but these are major contributors to transport carbon dioxide emissions. If you have bought a petrol car in the last 10 years, you can probably still drive it throughout London.

This is a race to the bottom to misinform, using an emerging range of issues, many centred on the car driver, seeking to convince enough people to change their suggested voting behaviours. Many transport planners and urban planners are aghast at these developments. But, of course, that is part of the strategy.

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The views expressed are personal.

**Notes**

- 1 DS Hillygus and TG Shields: 'Wedge issues in presidential campaigns'. In DS Hillygus and TG Shields (Eds): *The Persuadable Voter. Wedge Issues in Presidential Campaigns*. Princeton University Press, 2009
- 2 *Vehicle Licensing Statistics: 2021 Quarter 2 (Apr-Jun)*. Statistical Release. Department for Transport, Sept. 2021. <https://assets.publishing.service.gov.uk/media/6152cf1ce90e077a2e2adc86/vehicle-licensing-statistics-april-to-june-2021.pdf>
- 3 *The Plan for Drivers*. Department for Transport, Oct. 2023. <https://assets.publishing.service.gov.uk/media/651fe3022548ca000dddee82/the-plan-for-drivers.pdf>
- 4 F Ridler: 'Susan Hall: Tory London mayoral candidate liked tweets praising Enoch Powell'. *Sky News*, 15 Sept. 2023. <https://news.sky.com/story/susan-hall-tory-london-mayoral-candidate-liked-tweets-praising-enoch-powell-12961850#:~:text=Ms%20Hall%20was%20chosen%20by,leader%20at%20Mayor%27s%20Question%20Time>
- 5 P Walker: 'Tory London mayor candidate liked tweets praising Enoch Powell'. *The Guardian*, 15 Sept. 2023. [www.theguardian.com/politics/2023/sep/15/conservative-london-mayor-candidate-susan-hall-liked-tweets-praising-enoch-powell](http://www.theguardian.com/politics/2023/sep/15/conservative-london-mayor-candidate-susan-hall-liked-tweets-praising-enoch-powell)
- 6 J Franks: 'Susan Hall: Who is the Tory London mayoral candidate taking on Sadiq Khan?'. *Sky News*, 19 Jul. 2023. <https://news.sky.com/story/who-is-susan-hall-the-hair-salon-owner-and-london-mayor-hopeful-who-says-sadiq-khan-fears-her-most-12900878>

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## snakes & ladders

**Sue Brownill** on an example of the obstacles facing communities when they seek to develop their own sites and schemes for community benefit

# delivering community-led housing shouldn't be a game of snakes and ladders



On 29 June, as a member of Oxfordshire Community Land Trust (OCLT), I went along to celebrate the opening of our first scheme—eight affordable rented flats which will be run by a tenant co-op. It was a joyous, sunny event attended by OCLT members, some of the new tenants, councillors, the contractors, supporters and others who have a passion for affordable housing.<sup>1</sup> Yet the journey to get to this

point had taken over 10 years and had gone through as many ups and downs as the board game that this column is named after.

Why this long; why so difficult? In the face of a widely acknowledged housing crisis you might have thought that something as essential as affordable housing and a scheme that is community led would have ticked so many boxes that it would have been a breeze to deliver—yet you would be wrong. The fact that it exists at all is a tribute to the resilience of people who would not give up (take a bow, Fran Ryan) and the skills and patience of people who put in hours to fill in all the forms and negotiate with partners and agencies to get the land, funding and planning in place to make it all happen (thanks, Alison, Chris, Alice, Piotr, Jock, Vvy, Mark, Hannah,



Photography by © Ian Miles—www.flashpointpictures.co.uk

Oxford Community Land Trust members and supporters at the scheme opening celebration



John, Bob, and many others). And, unfortunately, I don't think their experience is a unique example.

The story of this one scheme can therefore tell us so much about what works and where the barriers are for communities wanting to come together to address the housing issue. So, in this edition of this column I am moving slightly away from a focus on participation in planning (although, as we will see, planning has a key role to play here) to look at what happens when communities go beyond participation to develop and own sites and schemes. I say slight because if we follow Arnstein's ladder of participation<sup>2</sup> and aim for communities being in control, owning land and assets is a key way of being so. What follows is based on feedback from my fellow members about our experiences, offered in the hope of giving encouragement to others that it is worth sticking in there—and also suggests things that need to change if we are to deliver more much-needed schemes like this.

### Negotiating the ups and downs

To give a bit more background, OCLT was formed when a group of people came together to do something about the lack of affordable housing in Oxford and the surrounding area, which is (in)famous as one of the most unaffordable places in the country. As well as addressing this issue, the idea of promoting community-led housing through a land trust was seen as an important part of the equation in terms of meeting a range of needs and providing housing that is affordable in perpetuity (CLT homes cannot be bought by tenants). The initial focus was Oxford city, but high land prices and a local authority at the time reluctant to support a CLT meant that when the opportunity came up to get a site just over the border, but still within the built-up area of the city, in the Vale of White Horse, it was seized upon.

This site was far from ideal, being largely back lands, but, in an area where rural exception sites and other schemes often used by CLTs don't operate, it was an opportunity not to be missed. So, acquiring it became our first move up a ladder in the game of delivering housing.

Others were to follow. OCLT got funding for drawing up the designs and getting planning permission and consulting with local people. We were supported by the Homes and Communities Agency (as was), which was keen to see more community-led housing providers to become a registered social landlord (RSL)—something that would have made us eligible for one of their grants. We thought that we were near the top of the board, but just before agreement was signed off a last-minute technical hitch over land ownership sent us sliding down a

massive snake, taking us almost back to square one as the guillotine on that funding window fell.

But we did have planning permission and (after some years to-ing and fro-ing with the Charities Commission) legal title to the land. We started throwing the dice again. We got more funding from government schemes that came and went, such as the Community Housing Fund, which enabled us to employ a project manager and progress the designs and plans. But another snake appeared when this funding was not renewed mid-scheme.

**'If we follow Arnstein's ladder of participation and aim for communities being in control, owning land and assets is a key way of being so'**

We accessed other sources of money from community-oriented venture capital schemes. We got masses of support from other CLTs and the CLT national network. We shot up more ladders when board members who had experience of social housing joined to boost our skills (but we fell down some snakes when others left). We went through the whole process of becoming an RSL again so that we could receive affordable housing grant. With the support of local councillors and officers we accessed part of the unused Section 106 pot, and we got money from the government-funded Oxfordshire Growth Board, but this was still not enough.

Smaller snakes in terms of delays in decision-making, access issues and Covid did not knock us off course. And while not a block to the scheme, there was disappointment in the realisation that, although we could charge below the 80% market rent termed 'affordable' by the government, we could not set the rents as low as we would like because of the scheme finances.

We carried on inching up the ladders, raising a mortgage with Ecology Building Society to cover the grant shortfall. We formed a supportive partnership with Soha Housing, another RSL, who agreed to take on the management for us. We went out to tender and appointed a contractor, striking lucky with LIFE Build Solutions. We issued a community share offer (with the help of some more schemes such as the Community Ownership Fund and the Booster Fund) and raised an amazing £560,000, which reduced our mortgage, hopefully enabling us to invest in other schemes. Finally, we found our tenants

through the local housing waiting list and they moved in! We had made it to the top of the board.

And all the time we were trying to find other sites by working with local authorities, individuals and organisations and making the case for community-led housing through writing reports and lobbying.

The history of some of those other sites is illustrative of the barriers to community-led housing. We bid on the open market for two sites being sold by public bodies/charities for redevelopment, working with a local sustainable architecture practice and putting in time, effort and resources to prepare designs and bids. One of these was an old school building owned by the diocese, the other the site of the redundant Oxford University Press paper mill. This latter site would have provided nearly 200 affordable community homes. In both examples the landowner claimed that they needed to get 'best value'. We could also only put in conditional bids, because as a small organisation potential borrowing was subject to getting planning permission. So we were not competing on a level playing field and were inevitably outbid by private developers or those with deeper pockets. We soon abandoned this strategy—too many snakes and not enough ladders.

**'The level of housing need is now so great that every means of providing the type of housing that people want and can afford should be supported. Furthermore, community-led housing has great potential both to enable people to have more control over their housing and to meet community needs'**

Critics of community-led housing may say that this shows how and why it can only be a niche provider. But in reply, supporters would argue that this is not an either/or situation. The level of housing need is now so great that every means of providing the type of housing that people want and can afford should be supported. Furthermore, community-led housing has great potential both to enable people to have more control over their housing and to meet community needs, rather than relying on the market. And, as our experience has shown, there is a well

of support out there—in terms of people who are not just prepared to give up their time but also to invest in the untapped potential of affordable housing.

It just should not be such a test of endurance to provide affordable housing. And many of the same issues affect local authorities and RSLs when they build—even if, as larger organisations with more resources, they can navigate the ups and downs differently. I will return later to what we might do differently to address this, but first I report on what those involved said about our experiences.

### **The experience of OCLT members**

Turning to the positives, everyone mentioned all those 'ladders' we managed to climb in securing the key delivery tasks—for example, 'Practical completion—seeing the wonderful building and eight flats built to a high spec'; 'essentially all the key tasks, because the site would not have been deliverable without them'; and 'meeting our tenants and seeing what a difference it is making to their lives'. All of this required 'brilliant volunteer directors and co-ordinators who gave so much time' and strong partnerships with the local authority, contractors and Soha—'we had massive local authority support from Vale of White Horse officers and members. LIFE Build Solutions were brilliant.'

Some ladders brought with them more encouragement and affirmation that all the effort was worthwhile. As part of the share offer an event was held at Trinity College which attracted more people, publicity and investment than we had hoped for: 'If I had to pick one thing it would be the community share offer and the turnout at Trinity College—a key bump in motivation through a hard slog.' This, and the fact that the share offer, despite our fears, was oversubscribed, showed us that there is 'so much more support out there'. Seeing the extent of support was a boost, and OCLT membership doubled through the share offer and good media coverage from local television and radio as we approached and reached completion.

On the negatives, there was the obvious issue of 'how long it took', with 'long waits for decisions (especially on funding) sapping morale'. Then there was the personal impact of 'trying to balance OCLT work with going back to full-time paid employment ... lack of free time, giving up hobbies!' Linked to this was a 'turnover of key directors who had very important roles'.

Members also highlighted the lack of consistent government support, such as the failure to renew the Community Housing Fund 'despite words



**The eight affordable rented flats delivered by the Oxford Community Land Trust**

of support from Michael Gove'. This meant that getting funding from a variety of places was almost a constant activity, and with 'funds being so tight we were not able to afford a full-time co-ordinator'.

Navigating the complexity of dealing with the Charity Commissioners, RSL registration, share offers and the like was also a major headache—relieved by having key experienced board members and buying in support when needed; but many groups may not be in this situation.

Added to this was the lack of working capital within a small organisation with a very limited asset base, reliant on conditional funding, and made worse by the cost and lack of access to land and the impossibility of bidding on the open market. And even with funding support, 'not being financially able to make rents properly affordable' was also seen as a downside by some members.

### **Changes that would make a difference**

Through this experience OCLT members have some clear ideas about what changes are needed to more fully support CLTs. According to work published by the Joseph Rowntree Foundation,<sup>3</sup> delivering affordable housing requires co-ordination of a golden triangle of land, finance, and policy. For community-led housing, there is at present no reliable and simple way of combining these factors without the massive effort outlined above. OCLT members would like to see more sustained and reliable central government funding, rather than the

stop-start process we experienced. The revolving loan fund in Scotland and other places is an example here.

More information on what is available through the accumulated off-site Section 106 pot and how to access it was also mentioned. Given that many local authorities have difficulty spending such monies, channelling some to CLTs would be beneficial. And members echo the calls for land value capture through the Community Infrastructure Levy or similar mechanisms not only to be stronger but also to ensure that resulting funds are channelled to community-led housing.

The provision of land at existing-use value and/or affordable levels is obviously vital, not only for CLTs but for affordable housing in general. More 'exception sites' are needed in urban areas and, while the Charity Commission has now relaxed some of its rules to enable social and environmental value to be taken into account in land disposal as well as best value, this does not extend to all public bodies. Planning policy can help here, including through a more robust National Planning Policy Framework, with a clear definition of affordable housing and policies which enable sites to be allocated for CLTs.

Planning is 'critical because it has the potential to create exception sites for CLTs and also to encourage larger developments to incorporate CLTs in affordable housing and stewardship roles... sites exclusively for permanently affordable homes that are also community owned need to be

identified in Local Plans.’ And ‘pro bono services from planning consultancies and law firms would help their social responsibility requirements and reduce overheads for CLTs’. Other ways that planning can support community-led housing can be found in the excellent Community First Yorkshire publication *A Planner’s Guide to Community Led Housing*.<sup>4</sup>

So, what would OCLT members pass on as ‘top tips’. First, be realistic. ‘Gain credibility as soon as possible by trying to acquire the most straightforward site. CLTs can spend years chasing market opportunities that drain time and resources and also negatively affect morale ... prioritise carefully to make sure you do the things that must be done; time is so scarce.’

Secondly, build networks and partnerships. ‘Work with your local planning authority to persuade them to support you through publicly owned land and grant funding ... Network with other CLTs and other groups even though you don’t think you have time to do this.’ Learn from other groups. ‘Share governance documents and tips when doing a share offer.’ Building and retaining capacity is key. ‘Try to convince local professionals with key skills (development, legal, etc.) to join your board as their experience can be critical. Try to divide the workload fairly to protect against burn out. Have fun and celebrate at key points for the same reason.’ Ensuring good media coverage, including social media, is also important. And last but not least, ‘never give up’ ... even when you do slide down one of those very long snakes.

### **‘The consistent financial and policy support which should enable this innovative and inclusive form of housing to become mainstream and realise its potential is just not there’**

While waiting for policy changes, OCLT’s work carries on, as do the efforts of hundreds of other groups grappling with the same issues. With one scheme under our belt, we are hoping to build on this success and attract more members, funding and opportunities, such as the current work being undertaken with Oxford City Council to unlock unused garage sites and discussions with developers around taking on their Section 106

requirements. Hopefully, we won’t encounter the same rollercoaster this time round.

OCLT’s experience shows that community-led housing can make a major difference, and that it is possible to build local partnerships and alliances to deliver much-needed affordable housing. But as our story of delivering just eight flats shows, the consistent financial and policy support which should enable this innovative and inclusive form of housing to become mainstream and realise its potential is just not there. With a general election coming up, there is plenty of scope for policy to change along the lines outlined above. But despite warm words of support, both main parties seem to be pushing the developer route.

Once you get to the top of the board it feels great and all the effort becomes worthwhile, but providing something as important as affordable housing shouldn’t be a game of snakes and ladders.

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#### **Notes**

- 1 A video of OCLT’s Open Day June 2023 is available at [www.youtube.com/watch?app=desktop&v=s9ljTsJgUOM](https://www.youtube.com/watch?app=desktop&v=s9ljTsJgUOM), and BBC coverage is available at [www.youtube.com/watch?v=1LALLajAiDI](https://www.youtube.com/watch?v=1LALLajAiDI)
- 2 S R Arnstein: ‘A ladder of citizen participation’. *Journal of the American Institute of Planners*, 1969, Vol. 35(4), 216–24
- 3 S Brownill, Y Cho, R Keivani, *et al.*: *Rebalancing Planning Obligations: Balancing Housing Numbers and Affordability*. Joseph Rowntree Foundation, Jul. 2015. [www.jrf.org.uk/report/rethinking-planning-obligations-balancing-housing-numbers-and-affordability](https://www.jrf.org.uk/report/rethinking-planning-obligations-balancing-housing-numbers-and-affordability)
- 4 J Lavis: *A Planner’s Guide to Community Led Housing*. Community First Yorkshire, Jun. 2019. [www.communityledhomes.org.uk/resource/planners-guide-community-led-housing](https://www.communityledhomes.org.uk/resource/planners-guide-community-led-housing)



# utopia— the wind in our sails or the ghost in the machine?

If we are to find ways to live peaceful, flourishing lives on a sustainable planet, we urgently need to rediscover the utopian tradition that once drove town planning as a progressive social idea, says **Hugh Ellis**

*'A map of the world that does not include Utopia is not worth even glancing at, for it leaves out the one country at which Humanity is always landing. And when Humanity lands there, it looks out, and, seeing a better country, sets sail. Progress is the realisation of Utopias.'*

Oscar Wilde: 'The Soul of Man under Socialism'.  
*The Fortnightly Review*, Feb. 1891  
Available in *Complete Works of Oscar Wilde* (Collins, 2003)

The collapse of English town planning as a creative discipline happened because we forgot a simple truth: planning is about reaching out for what ought to be, not about accepting the failed conditions of the present.

Utopianism used to be a vital way of collectively negotiating what that future should be and navigating a way towards it. The pursuit of utopia, by which we mean reaching for the ideal and not the impossible, gave us practical hope, and without it we have no tangible response to an age defined by crisis and division. The practical idealism of the utopian movement is the root stock of the TCPA, and the Association has been wrestling, through the 'Tomorrow 125' project,<sup>1</sup> with the uncomfortable questions which that rich legacy raises for our future. As a result, the TCPA has a unique viewpoint on what goes wrong when we forget that reaching for the ideal is the engine of all social progress.

This article is written through the lens of town planning because this provides a clear illustration of how legal structures and professional organisations cannot be sustained once they have lost a sense of the social purpose for which they were established. The motivation for writing this article now is not just to respond to the current government's disastrous planning reform agenda, but, more fundamentally, to try to set out some underpinnings for an approach to town planning that any future government might take.

The obvious mistake of focusing on procedural mechanics rather than purpose and outcomes has been repeated in the endless planning 'reforms' of the last 40 years. Success in building a new system depends on an understanding that form follows function, so we first have to be clear about the social purpose of town planning. If no such purpose can be established, then there is no future for planning as anything other than an algorithm for land licensing. But with the purpose clearly distilled, sorting out the mechanics of how planning should operate is remarkably straightforward.

The problem we face now is that there is no such agreed purpose. It was the utopian tradition which provided the initial dynamic force that drove town planning as a progressive social idea. But, from the early 1980s onwards, town planning decisively turned its back on the utopian tradition and in the

process abandoned any claim on a progressive future framed by social justice and planetary sustainability.

Painful though it may be, we have to acknowledge that town planning in its current state in England is finished as a creative and progressive discipline. There has never been a moment in the last 100 years when the stock of town planning as an idea, as a profession and as a public policy solution has been lower. Denigrated by Ministers, ridiculed in the media and disparaged by hard-right think-tanks, it has become unrecognisable from the force that did so much to secure progressive social and environmental outcomes in much of the 20th century.

It is not helpful here to repeat the weight of criticism of our current statutory planning system, which fails every possible test of policy coherence, strategic capability, democratic accountability, and overall purpose. Nothing can illustrate the moral bankruptcy of planning better than its bizarre toleration of the slum houses created by the deregulation of permitted development rights or its general failure to mobilise to tackle the climate crisis.

The planning discipline has reached a shameful state in which we as planners have become nothing more than central government functionaries, apparently incapable of finding the independence and self-confidence to challenge government policy. One hundred and twenty-five years after Ebenezer Howard's seminal book on social transformation<sup>2</sup> launched the discipline of town planning, we have allowed our role to be redefined as nothing more than traffic wardens for land.

In saying this, it is important to distinguish between the fate of the wider discipline of town planning and the undoubted expertise that there remains in planning practice. This resides partly in private planning consultancies and partly in the public sector, where those in public service continue to fight heroically for progressive outcomes, despite the system which has been imposed upon them. In this context the current laudable efforts being made to improve the morale of the planning service are welcome, but only as palliative care.

As someone with the privilege to speak to many planners I am clear that their morale can be improved only by getting to the fundamentals. Why? Because adequate funding depends on political acceptance that planning is an important public policy solution, and that in turn depends on remaking the social contract with the communities that planners serve. In short, can we, working together, offer solutions to make people's lives better and more fulfilling while navigating the impact of artificial intelligence, climate change, and entrenched poverty?

The answer to this question requires an understanding of what went wrong with the planning discipline.

### **The beginnings of town planning ...**

In its beginnings, town planning had two intertwined foundations. The first was rooted in a utilitarian appreciation that the conditions of homes and neighbourhoods have a profound impact on the whole of society through basic issues such as public health. Housing reform played a major part in a process which transformed the basic conditions of the industrial cities; but, while it was modestly progressive, this strand was not about social transformation in any systemic sense.

The second strand flowed out of the British utopian tradition—a tradition that focused explicitly on social transformation. It demonstrated its ideas partly in the foundation of new communities in the 19th century and partly in a wider radical call for the transformation of people's lives around the ideals of social justice and human flourishing. This was a period when Britain's most important utopian community at Letchworth provided the crucible for planning practice. Letchworth Garden City was founded as a community with a specific objective of social change in all aspects of life, from food to education, housing, health, and culture. No limit was applied to the ambition and scope of town planning in Letchworth.

By the time of the First World War the phrase 'town planning' had come to mean both the effective practical organisation of society to create minimum standards of health and wellbeing and the conscious transformation of that society to drive the attainment of radically improved conditions for working people. As the legal basis and professional organisation of town planning came into focus in the first half of the 20th century, town planning was seen as a creative, scientific, artistic and democratic practice crucial to the development of society.

In contemporary terms 'town planning' was taken to mean the socially just organisation of society to create the pre-conditions for human flourishing. As a result, town planning was a discipline with an interest in all the aspects of life that related to social organisation, even if the emphasis was increasingly focused on the design of homes and communities. The breath of this ambition made it of interest to a very wide spectrum of politicians, from the Conservative municipalism of Birmingham to the Labour movement's battle with industrial slum housing. In short, it was seen as a mainstream part of progressive and reformist politics.

It almost goes without saying that the way we understand town planning now stands in shocking contrast to that early ambition. Town planning has become synonymous with bureaucratic complexity, without the ability to demonstrate social value.

### **...and the split in its foundations**

It is now part of the orthodox history of planning to see its decline as linked to the triumph of neoliberal ideology from the late 1970s onwards. But, perhaps surprisingly, the seeds of the collapse



were present in the foundation of the planning movement in 1890s, and played out in an argument between the Fellowship of the New Life and the group it spawned, the Fabian Society.

On the one side, the Fabians, led by Beatrice and Sidney Webb, brought a new rigour to the collection and analysis of the evidence on poverty—a milestone in the origins of the social sciences. Their prescriptions were based on related assumptions about the importance of expert, technocratic and state-led solutions. The Fabians' rationalism was not simply right in its own terms but was vital to winning wider credibility and influence among politicians in the early 20th century. On the other hand, while the Fellowship of the New Life and the Garden City movement accepted and built upon the evidence, they continued to focus on a much wider ambition for social and personal transformation that included interests in, for example, human fellowship, mutual aid, spirituality, and sexuality, as exemplified in the work of Edward Carpenter, Patrick Geddes and Ebenezer Howard, among many others.

Understanding the nature of the disagreement between these two sets of ideas helps in

understanding what went wrong with the moral philosophy of town planning, and by extension progressive politics.

In some ways the split did not appear to be significant until the collapse of the post-war social democratic consensus in the 1970s. That consensus had many strands but was predicated on Keynesian economics, which complemented the Fabian view of an active state operating in the public interest. It failed partly because it ceased to have a credible vision of social progress.

It is striking that over the last 50 years the progressive left in the UK has failed to frame a credible set of ideals to lead us to better lives. Instead, the debate on our future has become a competition between different forms of managerialism within a dominant economic paradigm of wealth 'trickle down'. This has, at best, led us to provide specific patches to the particular social problems of the day without ever offering a vision of what society could and might be. Instead, it is the political right that has produced an effective narrative around liberty and free markets which, while lacking any underpinning moral compass or evidential basis, has proved immensely persuasive.

The absence of this progressive vision resulted from the sad failure of the Fabians and the Fellowship to find a way to coexist. Both sets of approaches have to be blended together to guarantee success. The lessons from Britain's second-greatest social policy achievement after the NHS, the post-war New Towns programme, clearly illustrates the need for a meeting of minds. Nonetheless, in the balance between the two it is utopianism which is the strikingly missing element in our current debate.

### The consequences of abandoning the utopian tradition

The abandonment of utopianism in general removed moral confidence about the future; and the example of town planning provides a useful explanation of what that has meant in practice. Essentially, the focus of town planning radically retrenched from an interest in complex social change to a narrow set of issues related to land use. This reduction in scope was accompanied by a change in ambition, from planning for what *ought* to be to a focus on *facilitating the existing conditions* of our lives. In short, this left the social value of planning as technocratic and defensive, with an objective of facilitating and mediating private property interests.

The question remains as to whether this collapse in our ambition was an inevitable result of the weakness of the utopian idea. The answer seems self-evident, given that utopianism has played no part in our politics for half a century—but it is nevertheless worth testing whether the idea has any merit.

Utopian politics was a dominant part of the British cultural landscape from at least the 1500s.<sup>3</sup> Along

the way there are countless and complex examples of agitation for social justice framed around the building of ideal communities. But it is important to note that this tradition of utopian thought has at least two significant strands.

The first is quite simply the *foundation of ideal communities*—the practical realisation of theoretical ideals on liberating the human condition from the poverty and oppression of the society into which people were born. This physicality is an essential part of utopianism's rooted practicality, and it sets a high bar for those offering pathways for change. Utopian politics is about the consideration of the practical delivery of the ideal in real places.

The second strand of utopianism is a way of *thinking about change*, rather than necessarily the creation of new places. In essence, it can be summarised as a constant questioning of existing social circumstances, and the contention that reaching for ideal outcomes is the essential dynamic of being human. It is this idea, expressed by Oscar Wilde in the epigraph at the head of this article, which is the motive force behind progressive politics. As a way of thinking about the future it suggests that we should not be encumbered by the orthodoxy of the present, nor by the realisation of fixed physical ideals, but should instead commit to the journey of continually exploring the human condition and working out how to secure human flourishing based on understanding gained during that journey.

This involves an act of 'moral imagination'—an idea developed by John Paul Lederach as a means of conflict resolution.<sup>4</sup> Moral imagination requires the capacity to transcend current, apparently fixed circumstances by suggesting creative possibilities that embrace complexity and accept the inherent



Clifford Harper

Utopia—the wind in our sails? 'And when Humanity lands there, it looks out, and, seeing a better country, sets sail.'



risk of challenging the existing conditions of our lives. While developed to deal with extreme violence, the idea has resonance for those many groups in society who no longer see any prospect of a hopeful future.

In fact, our collective future depends on an act of collective moral imagination, rooted in the reality of our lived experience and shaped by the relationship between our rational and spiritual faculties. That imaginative aspect enables us to move beyond 'patching up' the failures of the present to explore the possibilities of the ideal society. The moral aspect draws on a progressive tradition of placing human flourishing as our core objective, underpinned by a commitment to social justice, equality, democracy, and the restoration of the natural world. The point is not to *arrive at perfection*, but, in the *act of reaching for the ideal*, our lives and the connections between us are invigorated. The process of moral imagination provides a framework for navigating modern life's near-constant rate of change—from how to use AI so as to enhance rather than diminish human dignity, to offering hope of planetary survival.

The great weakness of the utopian tradition is the promiscuity of the ideas it applies to this imagining. It is at heart an attempt to express in physical form the moral philosophy of humanism. Since the broad objective is to enable flourishing lives based on the complexity of the human condition, the ideals are often viewed as confused, diverse, and even contradictory. The fact that they are positively anarchistic and anti-authoritarian made them deeply unpopular with Leninist and fascist philosophies.

Scaling across the countless and sometimes bizarre experimentations in the 500 years that led to the Garden City in Letchworth, we find some common themes in British utopianism—a concern to value and connect with nature; political and religious nonconformism; deep-seated pacifism and a belief in human fellowship; an interest in spirituality and the human condition; a concern for social justice and particularly the distribution of land; mutual and co-operative economics; a concern for different forms of nonconformist education; and the exploration of different kinds of democracy, including community-led mutual aid and strong anarchistic suspicion of state-led activity. In so far as there is a binding agent, it lies in the drive for human equality as the foundation of flourishing lives and a sense that this objective is the pre-condition of social organisation, and not, as at present, a disposable afterthought.

Taken together, British utopianism is rich, messy and diverse—and therefore stands among the most human and humane strands of thinking. It is significant that its concerns remain resonant today in progressive thought, with international parallels in debates around 'Ubuntu'<sup>5</sup> as an alternative to the Western obsession with individualism and competition.

The golden thread of British utopian thinking is not, as I had once thought, a series of individual experiments, but is instead a woven fabric with

direct relationships between, for example, Gerrard Winstanley during the English Civil War and the development of the Quaker movement, and the secular industrial community of New Lanark and the immense flowering of nonconformist and Quaker communities in the 1890s.

## **'Our collective future depends on an act of collective moral imagination, rooted in the reality of our lived experience and shaped by the relationship between our rational and spiritual faculties'**

Many of the ideas within this fabric were fully reflected in Britain's most ideal utopian community, the Garden City at Letchworth. It was a place of both social liberation and social experimentation—culturally, politically, and economically. But the tension between the Fabian movement and the Garden City movement reflected a fear among the Fabians that the type of people inhabiting the Garden City, and some of their aspirations, would discredit the entire cause of social justice. The Fabians' response was to denigrate many of the people living there as cranks, and to view their experimentation as a distraction from the real cause of general social improvement.

There is no doubt that the Fabians, epitomised by the Webbs and Benard Shaw, had a point given the wider public's response to Garden Cities. But the early marginalisation of practical, place-based social experimentation led to an assumption that only state-backed activity could genuinely effect radical change. Much has been written on the changing views of William Beveridge in his approach to the delivery of social security, but the net effect of the Beveridge Report was a programme of post-war social reform which ignored important lessons from the utopian tradition, not least the importance of community-led mutual aid. In the process, the justification for social change became tightly focused on measurable improvements in people's incomes or life expectancy, occupying politically safe territory which at the time must have appeared to be unassailable.

The danger in this focus was that it implied a requirement for technocratic and bureaucratic solutions in which decisions about how people should be housed boiled down to a technical conversation between professionals who knew best about engineering and financial viability. At worst this led to the dystopia of a single ego, often an architect, defining how people should live and forgetting that people's agency over their own future is a vital aspect of human flourishing.

Where questions were asked in relation to the high-rise social housing programme, politicians accepted the word of professional architects and developers, ignoring the voice and the needs of the people who would live there.

Once the utopian tradition had been extinguished, the question of human flourishing and the centrality of the human condition was lost from our development model. Planning was left with the legal structures and bureaucracy but with little understanding of the purpose for which these tools were created.

This left a kind of hollowness; a lack of moral imagination that could connect with the experience of people and communities—and that created a profound vulnerability. From the early 1980s onwards town planning came under sustained assault from neoliberalism, represented in the seminal 1985 White Paper *Lifting the Burden*.<sup>6</sup> This was the culmination of a highly successful campaign to position planning as a social and economic problem to be dealt with through deregulation, rather than as a key way of negotiating our collective future. And so it has continued (with a brief resurgence of the mechanisms of planning under the last Labour governments) for the last 40 years—to a point where successive governments have become frustrated that there is little left of planning to deregulate.

The response from the planning profession has, on the whole, been one of muted bewilderment. Without the utopian spark, planners tried to defend themselves using evidence of the utilitarian benefit of planning in supporting economic growth. But, of course, evidence ceased to be important in an era in which neoliberal economics became an article of faith.

## **'If we can remake the fabric woven of both traditions, we can provide what is so absent in our politics: practical hope of a secure, fair and sustainable future'**

In fact, the truth is that we as planners enabled many of the most negative aspects of planning reform, not least the slum housing produced by permitted development, because we failed to challenge government. At the heart of our compliance was a crisis of identity: without the ability to articulate any kind of core progressive social value, planners were left trying to defend cold bureaucratic structures which excited only an array of special interest groups, ranging from land speculators to conservationists.

Given the power and simplicity of the neoliberal narrative about liberty and free markets, it is unsurprising that town planning could so readily be swept away. Planning has retreated into a procedural

shell and lost any positive public or political support. But neoliberalism was not the principal cause of town planning's demise: it came from forgetting the DNA of planning's social purpose.

Ignoring utopianism destroyed the heart, not just of town planning but of progressive politics in the UK. It has left current debates about the future sterile and focused on marginal tinkering with the failures of neoliberalism. No-one has any idea how to answer the question of how we can live peacefully together, supporting flourishing lives on a sustainable planet. In short, without utopianism no-one can answer the most important question that presents itself in 21st century politics.

Utopianism does not have a single answer to this question. It is, above all, a negotiation framed by the diversity of people and places and driven by an ambition for social justice and equality and the desire to 'scratch the itch' in the human condition and explore new ways of connecting with each other and the planet upon which we depend.

Anyone who believes town planning to be an ambitious, creative and democratic way of negotiating a socially just future will always be involved in a struggle with powerful forces that benefit from the uneven distribution of wealth and power. As planners, we cannot duck that problem by pretending that this is not our core mission. To have a useful and creative future, town planning has to remake the relationship between its utopian and Fabian roots—on the one side the power that a rational understanding of social conditions brings, and on the other the power of a moral philosophy of exploring the complexity of what it is to be human and then framing the ideal social conditions for human co-operation with the fullest measure of personal liberty.

If we can remake the fabric woven of both traditions, we can remake our nation. Above all, we can provide what is so absent in our politics: practical hope of a secure, fair and sustainable future.

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### **Notes**

- 1 See the TCPA's 'Tomorrow 125' website, at [www.tcpa.org.uk/resources/tomorrow-125-website/](http://www.tcpa.org.uk/resources/tomorrow-125-website/)
- 2 E Howard: *To-morrow: A Peaceful Path to Real Reform*. Swan Sonnenschein, 1898. Available online at <https://archive.org/details/tomorrowpeaceful00howa>
- 3 WHG Armytage: *Heavens Below: Utopian Experiments in England, 1560–1960*. Routledge & Kegan Paul, 1961
- 4 JP Lederach: *The Moral Imagination: The Art and Soul of Building Peace*. Oxford University Press, 2005
- 5 See T Metz: 'What Archbishop Tutu's ubuntu credo teaches the world about justice and harmony'. *The Conversation*, 4 Oct. 2017. <https://theconversation.com/what-archbishop-tutus-ubuntu-credo-teaches-the-world-about-justice-and-harmony-84730>
- 6 *Lifting the Burden* was the government's White Paper response (Cmnd. 9571) to the Department of Trade and Industry's *Burdens on Business* report, both published in 1985

# ‘do the right thing’ — planning at the intersection of the ‘culture wars’

Long-standing tenets of good planning, such as public health, accessibility and sustainability, are moving into the crosshairs of the culture wars as the values underpinning planning and development choices are being increasingly contested using populist tropes, say **Gavin Parker** and **Mark Dobson**

At the heart of planning activity lie values and choices. The choices are, at face value, decisions about places, land use, and types of development. Yet, as any

practitioner can attest, such judgements also involve consideration of trade-offs over competing interests and priorities. They hold important



Math Seymour on Unsplash

Low-traffic neighbourhoods—drawn into the ‘culture wars’

implications as they involve shaping the future. As a result, planners are routinely questioned on the technical evidence base and wider stakeholder consultation underpinning any decisions. In a healthy democracy it is only right that a range of information is considered and ideas deliberated upon, not least to ensure legitimacy and accountability in process and outcome terms.

Crucially, such practices are central to establishing trust in both the planning process and its institutions. This is especially salient given that planners can no longer comfortably assume public support. Indeed, claims of acting in the public interest are routinely invoked as a justification for a range of particularised and quite disparate goals by a variety of groups as, when and where it may suit.

Beyond ongoing concerns about legitimacy, process and decision-making in planning, we see that the values that appear to underpin planning and development choices are being increasingly contested, using populist tropes. Without plumbing the murky depths of fake news, statistical distortion and outright untruth, we discern that one of the consequences of the conflictual nature of recent planning discourse is that planning itself is being dragged into the 'culture wars'. These are typically characterised as disagreements about cultural and social beliefs held by opposing groups, especially by people with more conservative attitudes versus those holding more progressive opinions. As a result, long-standing tenets of good planning, such as public health, accessibility and sustainability, have moved into the crosshairs of the culture wars to further populist political agendas (noting that sometimes such interventions are also promoted, somewhat disingenuously, as 'disruptors').

In this context, attempts to edge a climate-related policy agenda forwards by some groups are contrasted with attempts by others to vilify and undermine that trajectory.

For example, in Oxford earlier this year a crowd of approximately 2,000 people took part in a protest *against* measures to introduce low-traffic neighbourhoods (LTNs). This group took aim at a number of other urban planning initiatives, such as 15-minute cities, and more broadly climate action policies. A feature of the protest were placards displaying messages such as 'The 15-minute WEF [World Economic Forum] ghettos are not about climate, it's tyrannical control' and 'Say NO to the new world order. Say no to 15 mins prison cities. Wake up, people, wake up.'<sup>1</sup> Such claims appear to link a broader libertarian agenda with conspiracy theories which centre on elite control.

In such a febrile milieu, local authorities and planning practitioners can all too easily become targets, with 'town planners [...] cast as the acolytes of some shadowy new world order, intent on crushing liberty'.<sup>1</sup>



**Place-making can easily fall victim to political culture war interventions**

### **The erosion of confidence and the corrosive impact of cultural conflict**

Unquantifiable as they are, it seems that tensions over the operation and aims of planning have never been more apparent than they are now. This may be the consequence of a system in which discretion and political mores are part of the approach taken to decision-making. This is also a product of a time in which the public are both diverse but also information rich. It may also be, as Ian Dunt recently argued, that '[t]he British political system rewards short-term tactics over long-term strategy, irrationality over reason, amateurism over seriousness, generalism over specialism and gut instinct over evidence'.<sup>2</sup> This seems a credible accusation. It also sits uncomfortably with political messages recently adorning conference halls, such as the 'Long-term decisions for a brighter future' slogan displayed at the Conservative Party Conference in October 2023 and assertions at the Labour Party Conference in the same month that planning was to be 'bulldozed'.

Graham Haughton<sup>3</sup> noted over a decade ago that within British politics 'planning is almost a paradigmatic example of a sector used as a 'political football', one that every incoming administration attempts to use to explain the failings of the previous administration and demonstrate its own radical credentials', resulting in 'a bruised sector, accustomed to multiple reforms intended to 'cure' a problem that has been misdiagnosed'. While the near-constant political tinkering and reform of the planning system is not new, we view recent attempts to politicise planning ideas in the culture wars as distinct from previous forms of political scapegoating of planning.

Part of the reason for this shift is that the role of the planning system has expanded over the years, as more issues become apparent and understood to be important in achieving sustainable development.



Yet accompanying this change and the increasing complexity of the issues considered are allied feelings of uncertainty and frustration. Such underlying sentiments provide the potential groundswell for exploitation by populist discourses oriented to oppose change, and conditions also become ripe for fear-mongering from extreme perspectives (for example railing against 15-minute cities as 15-minute 'prisons' and 'ghettos').

As such, there are two 'fronts' to the culture wars: the first is propagated as part of *mainstream politics* to achieve populist goals; and the second is effected on the ground by various *alt-right and leftist groups*. We focus here on the former, while being wary of its impact in encouraging and stoking the discourse and actions of the latter.

The culture wars manifest themselves as exchanges of opinion about many different issues. We see the culture wars as an extension of, but also something that goes beyond, populism. There appear to be a variety of messages reflecting an attempt to speak to the 'common person', echoing key elements of Trumpism (for example 'Make America Great Again'). Populist agendas typically claim to be meeting the needs and wants of 'ordinary' people and are pursued to elicit their political support. In such narratives, the (will of the) 'people' is juxtaposed with the interests of the 'elite'; the privileged few versus the under-represented many—a line that can suit parties of both the left and right. This form of populist rhetoric was a core feature of British politics during the Brexit saga.

We argue that this should interest planners because, if we assume that UK planning systems and their operation reflect wider social attitudes and tensions (to a degree at least), then it follows that the conflicts and sense of dissatisfaction in the practices of planning are also shaped by wider social and cultural tensions.

In recently attempting to roll back on the UK's net-zero targets, Prime Minister Rishi Sunak effectively politicised the Climate Change Commission's (CCC's) Carbon Budget plans for 2050. The CCC is an independent body set up to advise the government, and Sunak chose to position its advice in terms of cost to the public: *'For those who disagree with me ... the question's for them—they should explain to the country why they think it's right that ordinary families up and down the country should fork out five, 10, £15,000? ... I don't think they need to, and if someone disagrees then they should explain why.'*<sup>4</sup>

Such politics represents one manifestation of the culture wars in its attempt to pit social groups against each other (i.e. positioning the claims of elite experts versus the needs of common people).

Wider political debates over big issues such as climate change and immigration (such as Suella

Braverman's recent pronouncements about multiculturalism<sup>5</sup>) are one thing, but there is less focus placed on smaller ideas that become politicised and then act as lightning-rods for creating division between groups, often using cultural value propositions derived from the left and right.

Politicians engaging in populist politics typically appeal to the idea of a *united people all wanting the same thing*; while the rhetoric of culture wars is more pernicious in its emphasis, where *division* and ideological-discursive *conflict* between groups becomes necessary. Issues become 'battlegrounds' to claim and assert the public good. What has been happening recently is that planning issues are increasingly being contested based on populist agendas and influenced by a politics of division. Planning in both its processes (see, for example, talk of 'project speed') and its outcomes (i.e. policies and initiatives as well as planning metrics) has drawn fire in this (*faux*) war.

While we should not be surprised that politicians make use of populist agendas when they appear to suit their own interests (especially when they are behind in voting polls and approaching an election), we see the impacts of short-term decisions, which rest on cultural division, as particularly corrosive to trust in public institutions and to effective long-term planning. This turn is quite possibly the latest branding of pre-existing divisions with a focus on 'culture', but it is ultimately also about past and future; of where we are going, how to embrace or avoid particular futures, and how to return to or surpass the past.

Some have argued that decline in trust in social institutions, and in those overseeing supposedly accepted conventions and the levers of power, have fed the culture wars. Others point to changing conditions in terms of growing inequality, accompanied by the accessibility of social media and associated technologies that enable people to communicate in a variety of social clusters or echo chambers. Plenty of local politicians align themselves to progressive agendas when they become inescapable, but such agendas, and their advantage, are not always clear. Why are progressive ideas absent in Local Plans? Is this perhaps especially so where strong leadership is absent, or the reverse; is this a result of 'corrective' leadership?

We reflect therefore on a new twist on what is actually an enduring story. Indeed, perhaps nothing is really new here; there have always been deep divides in British society. Some downplay the existence of culture wars, and others claim they are merely the concern of elite groups attempting to gain political advantage over each other. Liz Truss's 'Growth Group' and the blaming of a 'left-wing economic elite' for her downfall as Prime Minister ('are you part of the anti-growth coalition?') provides another exemplar. We can see that, whatever one's assessment, the ripple effects of the culture wars in

## Box 1

### Example 1 — Planning and beauty

Arguments over architectural styles and tastes have raged for decades and pre-date modern town planning, but they have recently resurfaced with a new twist in the era of the culture wars. This can be detected most clearly with the formal recognition of ‘beauty’ in policy. Some may say that this reflects an attempt at cultural appropriation of the planning system, whereas others might simply argue that it reflects what ‘people’ want — an often-used tactic is to claim ‘common sense’ for a particular view, or to make a choice seem obvious and unobjectionable.

In 2021 Nicholas Boys Smith was quoted as saying, in relation to beauty in planning, that the ‘ultimate purpose will be to make it easier for neighbourhood communities to ask for what they find beautiful and to refuse what they find ugly’.<sup>a</sup> Such aspirations are now reflected in formal planning policy guidance, as this extract from the NPPF highlights: ‘... ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed and beautiful homes’.<sup>b</sup> Others have indicated that this will actually become vexing for many actors, and its resolution in practice will in the end come down to who has the power to determine beauty and therefore which cultural pre-disposition will prevail.

Such an emphasis on planning pursuing ‘beauty’ may be seen as elitist, or geared to the wealthy. This preferencing sits in contrast to a deeper focus on, for example, alleviating socio-spatial inequalities and myriad other planning issues and considerations, such as affordable housing, employment, and infrastructure.

- a Nicholas Boys Smith, quoted in ‘All new developments must meet local standards of beauty, quality and design under new rules’. Press Release. Ministry of Housing, Communities and Local Government, 30 Jan. 2021. [www.gov.uk/government/news/all-new-developments-must-meet-local-standards-of-beauty-quality-and-design-under-new-rules](http://www.gov.uk/government/news/all-new-developments-must-meet-local-standards-of-beauty-quality-and-design-under-new-rules)
- b *National Planning Policy Framework*. Department for Levelling Up, Housing and Communities, Sept. 2023, para. 73. [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1182995/NPPF\\_Sept\\_23.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1182995/NPPF_Sept_23.pdf)

policy and politics locally and nationally are real and apparent, even if they are manufactured.

#### Planning as perpetrator, pawn, or victim?

Never too far from controversy, planning issues have also been in the crossfire because they are precisely cultural (as well as environmental and economic, or pertaining to some social agenda or another), and are essentially decisions over the future. How we preside over change forms a key battleground in the culture wars, too. Clearly, planning decisions and development can be targeted when they produce tangible outcomes that reflect directions or trajectories of change — both welcome and unwelcome. As a result of this correspondence, development can easily become refracted through the lens of the culture wars. The culture war controversies are fuelled by suspicions that change, and more specifically those marshalling change, are allowing particular values — values that are not settled or accepted — to be pursued via the planning system.

This situation has consequences for the practice of planning and for the politics that inevitably shape practice. It can appear that planning is being used to service one agenda or another and as a consequence may be ripe for attack, or appropriation, by one group or another. This will, in essence, be either on the grounds of not being progressive

enough for some on the left, or not fast enough, or sufficiently pro-growth or producing enough ‘beauty’ for others on the right. Different interests want planners and the systems that they oversee to deliver what they want for themselves and society more broadly.

Our contention is that good planning is becoming a victim of culture wars, and there is resonance with the line from 50 years ago spun by Aaron Wildavsky, reflecting on ‘why can’t the planners ever seem to do the right thing?’<sup>6</sup> Wildavsky’s assessment appears to imply that better balancing and accommodation would provide the answer, but, as we argue here, this has never really been the case, and the culture wars really highlight just what a challenging and divisive activity planning can be.

But while conflict and argumentation are the norm, a growing number of recent examples appear to be products of the culture wars. Such interventions are making good planning even harder. In order to amplify our main contention that planning is increasingly being drawn into the culture wars, we highlight three instances here — as set out in Boxes 1–3 — drawn from topics where questions of aesthetics, environmental policy and attempts to organise land use are in view.

The populist politics operating within and across these examples are, to a greater or lesser extent, creating a narrative of division that evacuates the

## Box 2

### Example 2— Planning and low-traffic neighbourhoods/low-emission zones

We can also see cultural conflict manifested in recent debates over the existence and importance of climate change—and as such the necessity or urgency to deliver climate action, such as reducing carbon emissions. The UK's commitment to achieving its net-zero targets has recently been called into question by Prime Minister Rishi Sunak. This wider politics has taken form in particular places, as well as in arguments over specific policies—notably conflict around transport policy, and in particular the extension of London's Ultra Low Emission Zone (ULEZ) scheme, and a backlash against 20 mph zones and associated low-traffic neighbourhoods (LTNs).

Indeed, Rishi Sunak has characterised LTNs as a 'war against motorists' and pledged to end 'anti-car measures', noting that penalising drivers going about their daily lives 'doesn't reflect the values of Britain'.<sup>a</sup> Those pronouncements quickly followed the Prime Minister's controversial decision to delay the ban on the sale of new petrol and diesel cars until 2035. Transport Secretary Mark Harper also stated that the Conservatives were about 'giving people more choice on how they travel... not banning you from driving your car'.<sup>b</sup> Along with a requested review into the national roll-out of LTNs (and 15-minute cities—see Box 3) by the Department for Transport, one of the main ideas floated is to 'rein-in' local authorities by limiting the number of roads that they can place under 20 mph orders. This politics is designed to appeal to the 'rights' of drivers and acts to stoke divisions between them and planners and road safety, air pollution and environmental action groups. This culture war intervention by the Prime Minister appears to ignore benefits to health, local services, and, in essence, place-making.

- a H Cole: 'SLAMMING BRAKES: Rishi Sunak says he's ending war on drivers by stopping LTN rollout chaos in a big win for Sun's Give Us A Brake campaign'. *The Sun*, 29 Sept. 2023. [www.thesun.co.uk/motors/24208749/rishi-sunak-car-drivers-ltn-speed-scheme/](http://www.thesun.co.uk/motors/24208749/rishi-sunak-car-drivers-ltn-speed-scheme/)
- b J Sandiford: 'Low-traffic neighbourhoods under spotlight as Rishi Sunak wants to 'support motorists''. *BirminghamLive*, 31 Jul. 2023. [www.birminghammail.co.uk/news/midlands-news/low-traffic-neighbourhoods-under-spotlight-27426250](http://www.birminghammail.co.uk/news/midlands-news/low-traffic-neighbourhoods-under-spotlight-27426250)

middle ground and explicitly pits groups against each other—and which is rendering planning issues, and trust in their institutions, toxic in the process.

### Conclusion— planning caught in the crossfire?

The wider context of political-party pressure to reform planning is further complicated by the way that planning issues can be used as both ammunition and a battleground in the culture wars that have recently accompanied populist rhetoric. We can view instances of culture war rhetoric as a struggle for dominance over the values, beliefs and practices that *should* be accepted within civil society.

If we can agree that the conflicts and sense of dissatisfaction in the practices of planning are shaped by wider social and cultural tensions, then we fear not only for the operation of the planning system but for the *basis* upon which planning policies and practices rest. This can be seen in examples that arbitrate where liberty and the environment are at stake—with planning often ending up a victim on both sides (i.e. for conservatives, over-stepping on individual freedoms, and for progressives, not doing enough to move beyond the status quo).

The examples presented are the headline-grabbers that place planning issues centre stage in political/ideological conflicts, but less apparent and unremarked are the everyday micro-aggressions which impact on trust as well as on the mental

health and wellbeing of planners. The divisions and tensions here are obvious: profession versus laity, left against right, traditionalist versus progressive.

So, what does this mean for the act of planning, and the way that policies are formulated both nationally and locally, when planning ideas are effectively weaponised in the culture wars? If planning in the past was about making careful arguments about what is needed in the public interest, now there is a 'war' being conducted in an attempt to claim dominance over politically polarised positions. How does this shape perceptions of the possible? What does this mean if 'debate' is reduced to merely talking past each other? In such circumstances, how can planners do the right thing? These are pertinent questions when longer-term sustainable development is at stake.

Given these observations, we see a core feature of the culture wars as appropriating the public interest while simultaneously destroying trust in institutions. This is problematic for planning and planners precisely because politicians rely on public institutions and public trust to fulfil their agenda and renew the democratic mandate. There is a clear relationship between values and trust in institutions, and attacks on those institutions for short-term political gain appear counterproductive.

Furthermore, perceptions of the 'capture' of planning decisions by opposing sides of a culture

### Box 3

#### Example 3—Planning and the 15-minute city

At face value, the 15-minute city/20-minute neighbourhood appears to be a relatively innocuous, if important, planning idea. This has been discussed and experimented with in other countries over time, and aligns with a much longer lineage in thinking about urban villages and considering the benefits of localisation. The idea has recently received some significant attention in the UK.

At one level the idea is quite simple: places should be accessible, with services and social infrastructure within easy reach for people. The concept is closely linked to questions of sustainability and liveability. For many, ideas about making places more sustainable and accessible may seem uncontroversial, but critics have made a (perhaps tenuous) connection to questions of individual freedom and choice — as if the idea will result in people living in self-contained areas. The depth of such suspicions (as well as the opportunity for opposition that almost any planning idea seems to provoke) can be quite alarming.

Those concerns over personal freedom were clearly shown when Conservative MP Nick Fletcher made the headlines in requesting a parliamentary debate to investigate the ‘international socialist concept of so-called 15-minute cities and 20-minute neighbourhoods’.<sup>a</sup> Here the rather indolent (mis)use of the term ‘socialist’ is mobilised pejoratively as a catch-all label for something ‘bad’, which positions the heroic liberal conservatives protecting individual freedom against those deemed on the left, who want to stop people being able to go where they want, do what they want, and act as they have always done. Such sentiments prompted the Department for Transport to state that it plans to stop councils implementing so-called ‘15-minute cities’ amid fears that they would ‘aggressively restrict where people can drive’.<sup>b</sup>

- a Request by Nick Fletcher MP for a debate on 15-minute cities and 20-minute neighbourhoods, cited in *Hansard*, 9 Feb. 2023. Business of the House, Vol. 727, Col. 1042. <https://hansard.parliament.uk/Commons/2023-02-09/debates/306A686A-9B53-42BE-9367-C12AB4771504/BusinessOfTheHouse#contribution-94431A3F-FEB8-4A2C-B979-1EE81B5F1FFF>
- b ‘Rishi Sunak attacks ‘hare-brained’ traffic schemes and vows to ‘slam brakes on the war on motorists’’. *Sky News*, 30 Sept. 2023. <https://news.sky.com/story/rishi-sunak-attacks-hare-brained-traffic-schemes-and-vows-to-slam-brakes-on-the-war-on-motorists-12972941#:~:text=Rishi%20Sunak%20has%20said%20he,where%20there%20is%20local%20consent>

war add to a sense of planning being not only under attack, but positioned in a place that cannot ever hope to satisfy both sides of manufactured cultural divides—unable to ever do the right thing.

● **Professor Gavin Parker and Dr Mark Dobson** are both based at the University of Reading. The views expressed are personal.

#### Notes

- 1 R Partington: ‘Tackling the 15-minute cities conspiracy means fixing inequality’. *The Guardian*, 26 Feb. 2023. [www.theguardian.com/business/2023/feb/26/uk-economic-uncertainty-adds-fuel-to-fire-for-conspiracy-theorists](http://www.theguardian.com/business/2023/feb/26/uk-economic-uncertainty-adds-fuel-to-fire-for-conspiracy-theorists)
- 2 I Dunt: *How Westminster Works ... and Why It Doesn't*. Weidenfeld & Nicolson, 2023
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## ‘Politicians need to pause for thought and recognise the importance of planning, rather than indulging in gaslighting of long-standing social values and necessary institutions’

We are left doubting whether any initiatives can be implemented in such an environment. Politicians across the parties need to pause for thought and recognise the importance of planning, rather than indulging in what is becoming a continual gaslighting of what are, in the main, long-standing social values and necessary institutions—let alone ideas that should be regarded as eminently sensible.



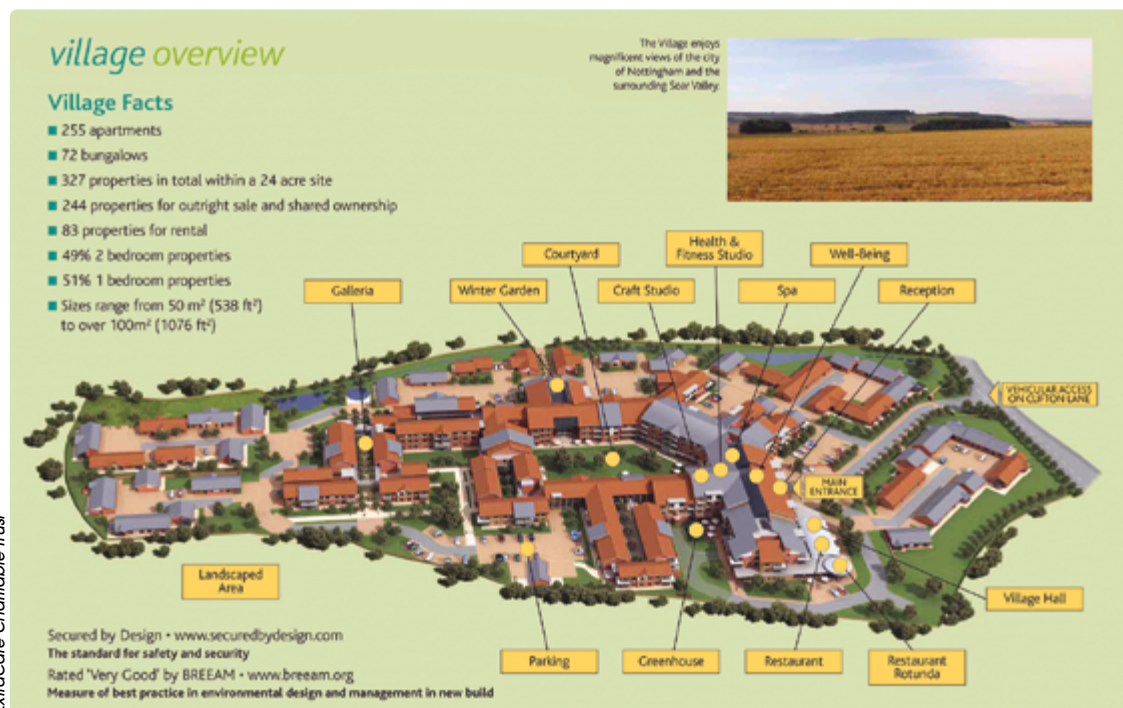
# home again — new models of residential care

The residential care home sector is in a parlous condition, but ambitious voluntary sector organisations are offering important new models of care, says **Ken Worpole**

One of the many fault-lines in public provision revealed by the Covid pandemic was the isolation of those in residential care. In the first half of the 20th century social care transitioned from the domestic to the public sphere—principally to the municipal sector—but it is now in the process of moving from the public sector to the private sector. This means in many cases that public accountability

disappears into a complex tangle of investment arrangements, some of which have their ultimate financial home offshore and, most worryingly of all, beyond regulation.

According to Denis Campbell, Health Policy Editor at *The Guardian*, 'Private companies now own and run 84% of beds in care homes in England used by older people, as local councils have almost totally



ExtraCare Charitable Trust

Site plan for Lark Hill Village, in Clifton, Nottingham

withdrawn from a key area of social care they used to dominate.<sup>1</sup> As a result, there is now a substantial disconnect between financial ownership, corporate management, workplace management, and the philosophy of care as practiced on a daily basis.

This does not make for an ethos of dedicated care in the long term, and it is why there is now a serious debate about bringing the whole social care sector within the National Health Service regulatory umbrella. Historian Peter Hennessy returned to this feature of modern democratic societies with the title of his post-pandemic manifesto: *A Duty of Care: Britain Before and After Covid*.<sup>2</sup> He concludes his public appeal with a call for 'a new Beveridge', advocating five key 'tasks' for the future, the first, because of its urgency, being social care.

Too many older people still suffer, in the words of the sociologist David Sudnow, a 'social death' long before their physical demise. Stories of over-regimentation, or even maltreatment, became associated with social exclusion and isolation. A Commission on Residential Care organised by the think-tank Demos a decade ago reported that: 'The picture from the research was clear—the public broadly see residential care homes as places of illness and frailty, where boredom and loneliness pervades, and where you would only go as a last resort.'<sup>3</sup>

As the Covid pandemic retreats, it is leaving the residential care home sector in a parlous condition. At the outbreak of the pandemic in 2020 there were 465,000 care home beds in England, 55,000 fewer than in 2000, but with an estimated need for 110,000 additional beds by 2030. According to a 2020 survey, 78% of existing care home beds are 'in properties not originally built with care use in mind or are more than 20 years old'.<sup>4</sup> The pattern of provision for 'age-friendly housing' and residential care in its many iterations is fragmenting, even as more positive initiatives come forward. The problem is that in the UK there is a dearth of suitable housing to meet this need. A study in Sheffield estimated that by 2034 there will be 'a shortfall of around 5000–8000 purpose-built retirement dwellings in Sheffield alone'.<sup>5</sup>

Out of sight, out of mind sadly characterises one of the problems of much residential care. This spatial marginalisation results from the fact that land prices have driven many care homes out of the inner city and town centre neighbourhoods where their residents once lived, to cheaper peripheral sites, to former redundant country houses, or to struggling coastal resorts where former hotels and guesthouses are cheap to re-purpose, even if unsuitable. Another way of putting it is that the residents have been exiled.

Fortunately, some voluntary sector organisations are now taking a lead in offering new models of care, especially in the field of social housing. Important initiatives include what is now called 'the new almshouse movement', and the work of pioneering charities such as the ExtraCare Charitable



Wetherford Watson Mann Architects/Phillip Vile

#### Appleby Blue's Garden Court

Trust, with its ambitious programme of active retirement communities imbued with a strong social and therapeutic remit. In 2009, following research I had undertaken into the modern hospice movement in the UK, *Modern Hospice Design: The Architecture of Palliative Care* was published. Two years ago, Routledge commissioned a much-expanded, post-Covid, second edition, to include other initiatives in social and palliative residential care: almshouses, retirement villages, and the growing network of Maggie's cancer care centres. This is now published.<sup>6</sup>

Of many new case studies, two are of particular interest to planners. Both embrace a philosophy prioritising high levels of interaction and integration with the community: Appleby Blue Almshouse in Bermondsey, South London,<sup>7</sup> and Lark Hill Village in Nottingham.<sup>8</sup> The former was commissioned by United St Saviour's Charity (USSC) in Southwark and opened in autumn 2023 to widespread acclaim, and the latter is a large-scale development by the ExtraCare Charitable Trust.

#### Appleby Blue Almshouse

Appleby Blue Almshouse was developed as part of a Section 106 agreement, or 'planning gain'. Designed by Stirling Prize winners Wetherford Watson Mann Architects, it is owned and managed 'in perpetuity' by USSC. The amount that residents pay towards living at the almshouse will be affordable and within current Housing Benefit limits. It therefore remains true to the principles of the commissioning



**Appleby Blue—elevation to the high street, with adjacent bus stop**

charity, while also being forward-looking and open-minded in its design.

A founding principle of the design of the new building was to encourage residents to remain active in the community where most have lived for much of their lives (many of them in social housing paying a ‘fair rent’), by supporting a strong culture of personal independence. To this end, the design of the ‘front of house’ of the building is that of a social hub or ‘public lounge’. The street in which it now sits, and to a degree now commands, remains a much-loved and busy thoroughfare, and the almshouse has its own bus stop outside the front entrance.

Appleby Blue provides 57 new homes—51 one-bedroom flats and six two-bedroom flats—all spacious and precisely designed. Eleven of the homes are wheelchair accessible. Appleby Blue is ‘care-ready’, in the words of the commissioning charity, offering lifetime homes that promote independence for as long as possible, and allows for residents’ existing and future health and care needs. From a purpose-built ‘community kitchen’ to bring people together, to the courtyard, gardens and a multitude of shared community spaces and resources throughout the development, the almshouse will be a place where residents are firmly at the centre of life around them. In her enthusiastic review of the project for *RIBA Journal*, Eleanor Young noted that, ‘The charity [USSC] sees itself, and its two earlier almshouses, as enabling people over 65 to remain part of the city, rather than retreating.’<sup>9</sup>

The main public feature, apart from its significant presence on the street, is a double-height public lounge at the point of entry into the building, intended as a meeting place, where residents, family, friends and other residents in the area can come and go freely, and where there are refreshments on sale, events, cookery classes, art exhibitions, and occasional performances. At the rear of the lounge there is easy access to a courtyard garden, again open to all users, unless otherwise designated for private purposes.

The almshouse and courtyard gardens consist of a series of connected elements, sequenced in degrees of public accessibility, ranging from the fully public to the wholly private. In this as in other more recent developments in residential care, the dangers of social exclusion of the elderly from the wider community are avoided. Given that Julia Park and Jeremy Porteous, in their key study *Age-Friendly Housing*, have concluded that ‘older people are the social glue of communities’,<sup>10</sup> such porousness is in the interests of everybody who wants to see resilient communities thrive again.

The project has already been the source of considerable public and architectural interest. Giovanna Dunmall, writing in *Wallpaper*, concludes that many ‘elements [...] make this project emotionally literate and quite different from existing models of older people’s accommodation. There is no doubt that Appleby Blue will become a blueprint for the provision of older people’s social housing.’<sup>11</sup>





**The Lark Hill woodwork shop**

### **Lark Hill Village, Clifton, Nottingham**

Lark Hill Village, completed in 2009, is now the largest retirement village in Europe. With 470 residents in 2022, it comprises 327 one-bedroom and two-bedroom apartments, and is the most recent development from the ExtraCare Charitable Trust, based in Coventry, which now operates 16 not-for-profit retirement villages in the Midlands and the North of England. The trust was established in 1988, and grew out of the Coventry Churches Housing Trust. Its Corporate Plan for 2022–2027 explains quite emphatically that ‘the charity was founded to provide an alternative to the prevalent, ageist and rather depressing societal view of getting old and later living’.<sup>12</sup>

The trust says that its ‘retirement villages are not just about providing new places to live. They’re about giving their residents a new lease of life.’<sup>13</sup> The trust’s mission is:

*‘creating sustainable communities that provide: i. Homes older people want; ii. Lifestyles they can enjoy; and iii. Care if it’s needed. [...] our ambition is to remain innovators, providing best-in-class supported retirement living opportunities’. [Our model] supports older people to stay active, healthy, safe and independent for longer...’<sup>12</sup>*

Lark Hill occupies a hillside, 24 acre greenfield site on the outskirts of Nottingham, with its own bus stop and a nearby tram link into the city centre. The

development is a mixture of one- and two-bedroom bungalows and apartments, 40% for sale, 40% shared ownership and 20% rented, although these percentages can vary according to changing local circumstances, whether of need or demand. To be eligible to apply for residence, either the applicants or a close family member must be resident in Nottingham and pay council tax to Nottingham City Council, and applicants should be over 60 (or 55 in exceptional circumstances). It is, in the words of one resident, ‘a community for independent living, not an old people’s home’.

What strikes any outside visitor is the spaciousness of the whole development, with generous wheelchair-accessible pedestrian thoroughfares both inside the complex and outside on the estate, the latter marked by well maintained pedestrian routes, lawns and public gardens, making it a genuine garden village. The public grounds of Lark Hill and the common spaces around the main buildings are all beautifully designed and maintained. Residents have acquired not only a home of their own, in an enviable parkland setting, but also access to an extraordinary range of health and leisure services and facilities provided by the not-for-profit charity.

The facilities offered to residents, and to visitors and nearby neighbours who can pay to use them, include a café bar, a craft room, an enriched opportunities suite (to support residents with dementia), a fitness suite with gym, a spa pool and



steam room, an IT suite, a hairdressing and beauty salon, a laundry, a library, a restaurant, a shop, a village hall, a greenhouse, a winter garden with indoor bowling green, a woodwork room, and many other amenities.

The ethos of each of the ExtraCare Charitable Trust villages is to encourage activity and wellbeing through extensive programmes of events, activities and support for voluntary groups and particular interests, such as woodworking, gardening, maintaining a large wildlife pond (with 89 species of flora and fauna recorded), bowls, choral singing, line dancing, and yoga.

The facilities for residents at Lark Hill to engage with all of these activities and interests are impressive and well used, some contributing to the community in practical ways: in food-growing and in maintenance work, for example. A paid activities organiser and two paid 'wellbeing' workers (one nurse and one adviser) support residents as and when needed.

The trust claims that it has 'developed an award-winning support programme and employ[s] specialist staff to help those residents living with dementia to continue to live as independently as possible in our villages and schemes'.<sup>12</sup> The trust provides a model combining some of the best elements of 'lifetime homes' and 'ageing in place'.

### Evidence-based wellbeing

An evidence base for health and welfare provision is becoming ever more necessary in fund-raising and governmental circles. The ExtraCare Charitable Trust employs long-standing partnerships with Aston University and Lancaster University, tracking improvements in depression, perceived health, memory, and autobiographical memory. These are among some of the general findings resulting from the ExtraCare approach based on research with residents:

- NHS costs reduced by 38%;
- unplanned hospital stays reduced from 8–14 to 1–2 days;
- a 46% reduction in routine and regular GP visits;
- a 14.8% reduction in depressive symptoms in 18 months;
- a 23% decrease in anxiety symptoms;
- significant improvements in the level of exercise done by residents (75%);
- an increase in walking speed and a reduction of falls over the first two years;
- delayed or reversed increase in residents' frailty;
- a 24% increase in autobiographical memory and a 17% increase in memory recall tests; and
- 86.5% of residents 'never or hardly ever' lonely.<sup>14</sup>

Likewise, Appleby Blue has established close links with the Dunhill Medical Trust and Bournemouth University, and thus both projects are working in close partnership with research bodies to assess the primary and secondary benefits of good design,

management, and other factors that support personal wellbeing and other social benefits. Evidence-based design is currently a mantra in the health care sector, but in both these projects close co-operation between in-house staff and external researchers is much more 'close up and personal' in the best sense of the term. One hopes that the age of 'one size fits all' residential care is coming to an end.

● **Ken Worpole** is a writer on architecture, landscape and public policy. His latest book, *Modern Hospice Design: The Architecture of Palliative and Social Care*, was published by Routledge in October 2023. The views expressed are personal.

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# the contribution of adaptive re-use to housing supply— what does good office-to-residential conversion look like?

**Manuela Madeddu** and **Ben Clifford** look at the conversion of offices to homes in Italy and ask what it takes—and how much it costs—to turn offices into good-quality healthy homes

The sustainable conversion of former office buildings to residential use can be a really good idea, particularly when land for new development is scarce and there is a shortage of affordable housing. In the context of a 'housing crisis', a mixed approach to increasing the availability of housing makes a lot of sense. However, there are important caveats here. First, not all office buildings have conversion potential; some are simply in the wrong place. And second, those that have locational and typological potential will often be costly to convert, unless they comprise high-street offices being returned to residential use.

The government in England has brought building conversion into serious disrepute. Its permitted development rights (PDR) reforms have prompted a race to the bottom—the cheap and largely unregulated conversion of buildings that have little or no adaptive re-use potential, poorly located and shoddily turned into 'homes' or, as many have noted, '21st-century slums'. This has happened because of ideologically driven policy choices to respond to the housing crisis through the deregulation of rules intended to support housing quality, rather than

making the investments needed in healthy homes. However, sustainable conversion which delivers good-quality housing can work. It works all over the world, where standards are closely regulated and where the development sector recognises the value that can be extracted from good conversions. In this article, we explore the conversion process and some of its outcomes in Italy, which provides examples of successfully turning former offices into healthy homes.

England's housing crisis today is one of soaring private rents and mortgage costs, aggravated by inflation and the interest rate response of central banks globally. It is a crisis of affordability that is affecting many households. Latest data reveal that average house prices across England are 8.3 times average earnings, and renters are typically spending a quarter of their incomes on rent.<sup>1</sup> These are national figures. The affordability crisis in London and the South East is far more acute, with younger households feeling its brunt.

There is an urgent need for housing to be more affordable and for affordable housing. These are two



Barbara Grigoletto



Marco Manfredi

**Conversions in Italy—Torre GalFa, Milan (left), and (right) 5Square Via Antegnati, Milan (under conversion)**

different things. At a macro-economic level, earnings have not kept pace with asset prices, specifically landed property. There are numerous demand and supply side explanations for this. On the demand side, housing financialisation is a structural form of rentierism that sees land targeted as a global asset class.<sup>2</sup> Housing and land are made attractive to investment in some countries by low property taxes. Money flows into housing at a faster rate than housing can be built, notwithstanding environmental or regulatory barriers. On the supply side, all of the above is deemed ‘academic’, and it is argued that we are simply not building enough market housing, usually because planning systems are slow, bureaucratic, and mired in politics. The Centre for Cities<sup>3</sup> says that there is a backlog of 4.3 million homes, largely down to problems in the planning system.

Sensible voices tend to argue that, while we’re sorting out the macro-economic and local reasons why housing is unaffordable (if this is something that we eventually choose to do), we need to be building *affordable homes*. This usually means investing in non-profit, non-market housing, built by local authorities or registered providers. The urgent response to a housing crisis should be to build the sorts of homes that are actually needed by households unable to afford market costs.

One alternative (some would say ‘supplement’) to building the homes that we need is to unlock the potential of ‘under-used’ non-residential buildings—office buildings and similar. There seem to be two impetuses for doing so.

The first is to negate the need to build new homes unnecessarily. Adaptive re-use makes sense and can be a sustainable development option (for example considering embodied carbon and accessible locations). The government’s recent (but now abandoned?) mantra of ‘build, build, build’ got it into trouble with some of its own voters. Its attempt to head in the direction of a zonal planning system, removing some of the local discretion and scrutiny around development applications, prompted a by-election backlash in 2021 and reminded government that building new homes where they are needed is not always easy or popular.

The second impetus is to duck the expense of investing in good-quality affordable homes. The macro-economic forces noted above have significantly elevated development land prices in recent decades. Any land coming onto the market in London will command a high price. Public bodies, including Homes England, are still in the business of acquiring land for development, but high land costs make it extremely challenging to build genuinely affordable homes (i.e. ‘social rent’ as opposed to far less affordable tenures such as ‘first homes’ or so-called ‘affordable rent’).

This makes it extremely difficult for councils or registered providers to build homes for the economically marginal and most-vulnerable households, begging the question as to whether there might be a short cut to getting more affordable homes built. In a context of spending austerity and soaring land prices, PDR reforms made their entrance.

The adaptive re-use of redundant or under-utilised buildings has many benefits. It scores highly in terms of sustainability, and potentially is an important means of tackling the global environmental crisis. In the UK, 25% of greenhouse gas emissions are attributed to the built environment, and prioritising 're-use and retrofit' is not only a greener alternative to demolition and reconstruction but is also a more effective way of conserving energy than new buildings, even those using lower-carbon materials.<sup>4</sup> The report of an inquiry conducted by the APPG (All-Party Parliamentary Group) for Housing Market and Housing Delivery and the APPG for Ending Homelessness, published in July 2023,<sup>5</sup> has flagged the potential role of commercial-to-residential conversion as a partial solution to the housing crisis—particularly following the Covid-19 pandemic, which has led to an increase in the number of empty buildings: currently 7% of office space and 14% of retail units in England are vacant.

However, building conversion is not cheap. Office buildings, in particular, often have large floor plates and other typological characteristics (i.e. a building's layout, structure, and facades) that make their conversion to (reasonable-quality) residential use challenging: careful attention needs to be given to their re-design, which often means that adaptive re-use will be expensive. Locational attributes (such as accessibility, and proximity to suitable neighbouring uses and to services and amenities) also influence their conversion potential.

There is a big difference between adaptive re-use that supports the delivery of healthy homes and a process of deregulated conversion that risks creating 'slums of the future'.<sup>6</sup> It is very important, in our view, to shine a light on this difference. There has already been a great deal of critique of the government's PDR reforms and their impacts on housing quality and the wellbeing of households who end up living in some of the worst conversions.<sup>7</sup> In fact, a chorus of voices has been unequivocal in its condemnation of extremely low-quality and isolated office conversions.

Such conversions are not a new phenomenon in England, but the practice has been given a new lease of life through PDR. A practice that was once, for good reason, challenging and costly has become cheap and cheerless. To recap, a decade of PDR reforms has allowed changes from offices (since 2013), and then light industrial and retail uses (since 2015), to residential use without the need for planning permission. Between 2015 and 2021, PDR have produced 83,611 new housing units, which represent around 5% of the total net additional dwellings.<sup>8</sup>

Criticism of the reforms and their outcomes led the government to introduce some changes (such as the requirement for adequate natural light and for the consideration of the Nationally Described Space Standard in new conversions since 2020/21).

These tweaks, however, are insufficient to guarantee that converted homes are of high quality, with the aforementioned APPGs suggesting that much more needs to be done, not only with respect to the quality of the buildings themselves, but also in terms of accessibility to key services and amenities.<sup>5</sup> In the meantime, the TCPAs 'Campaign for Healthy Homes'<sup>6</sup> is calling for homes that actively 'promote people's health' and, against the backdrop of the PDR reforms, it is perhaps difficult to see conversions playing a role in this respect.

However, while office-to-residential conversion has been brought into disrepute in England by government-sanctioned abuse of the PDR system, many countries extract high-quality healthy homes from building conversions.

### Regulation and conversions in Italy

In recent research, we turned to Italy to understand how conversions are undertaken within the context of a regulatory planning system based on a zoning approach.<sup>9</sup> We aimed to compare the outcomes of deregulation, achieved through PDR in England, with regulated conversions in Italy. The aim was to reconsider the role of local planning in ensuring good outcomes.

While England has its discretionary planning system, which normally considers applications case-by-case against Local Plan policies and requires prospective developers to show how policy stipulations and obligations will be met, Italy operates a compliance-based system, in which codes and regulations—rooted in *public health legislation*—fix standards that aim to guarantee the quality of housing, whether arising from new build or through conversions.

These national regulations include a general building code (*Testo Unico dell'Edilizia*)—introduced in 2001 and subject to periodic revision—which provides technical rules for buildings, such as those concerning accessibility, fire regulation, and safety; and building standards (*Istruzioni Ministeriali*)—introduced in 1896 and revised in 1975—which established minimum standards, including floor space, ceiling height, and window dimensions that ensure sufficient natural light. These national regulations are incorporated into local codes (*Regolamento Edilizio*) that reflect the specificity of local contexts. This means that 'exceptions' to the rules are possible—for example in relation to the conversion of historic buildings, for which minimum ceiling height and window dimension requirements might be overruled by the need to preserve the façade's integrity. Building conversions are also regulated through the Local Plan (*Piano Regolatore Generale*), which permits only 'compatible uses' in specific development zones and guarantees minimum service and infrastructure provisions.

As Italian regulation is often criticised for being too rigid and a brake on innovation, we sought to





**Corte Alfieri's internal courtyard, Turin**

understand not only whether and how planning and regulations support house quality, but also how the flexibility/inflexibility of those regulations affects outcomes. To do so, we looked at four case studies, located in the northern cities of Milan and Turin, and which are representative of the range and type of conversions being undertaken in this part of Italy. In Milan, conversions are being spurred by a surplus of office space and the presence of empty buildings. In Turin, the impetus behind office-to-residential conversions comes from growing housing demand and the availability of historic buildings once used as offices.

Torre GalFa, in Milan, is a 31-storey tower, designed in the 1930s' international style and built in the 1950s, located in the city's central business district. The building has been partly converted into flats (originally intended for sale but now offered as temporary accommodation) and partly into a hotel, and also includes a restaurant and a gymnasium open to the public.

5Square Via Antegnati, also in Milan, comprises five perimeter blocks, of three to five storeys, built in the 1980s and located in the southern periphery of the city. These offices have been converted into social housing for both sale and rent as part of a regeneration project which includes the provision of community spaces, green areas, and playgrounds at the ground floor.

Palazzo Novecento, built between 1928 and 1930 in Turin, is one of the first 'rationalist' buildings in Italy; it is a seven-storey building located in the city's historic centre, next to the River Po and one of the city's main parks, and has been converted into flats for private sale.

Corte Alfieri is also located in Turin's historic centre and is a typical 19th-century courtyard building, originally built for residential use and then used as office space from the beginning of the 20th century; it is now converted back to residential use, with flats being sold in the open market.

It was noted above that typological and locational factors are key determinants of residential conversion potential, with another key determinant being the cost of conversions and the willingness to secure necessary investment.

The inner-city location and architectural quality of the buildings in three out of our four case studies provided potential extractable value from their redevelopment that made costly conversions possible. In Palazzo Novecento, for example, an extra staircase was added to overcome circulation and spatial distribution issues related to the original office floorplan; the basement was extended, with two extra floors excavated to provide flats with cellars and parking spaces. In Torre Galfa a vertical shaft was added to the back of the building to provide separate entrances for the hotel and the housing units, giving residents necessary privacy; a new façade—built with the same modularity, rhythm and language of the original one—was provided to enhance the building's energy efficiency. In Corte Alfieri the old internal balconies were replaced with newer larger ones; some roof terraces and underground parking were added; the internal courtyard was renovated and now includes a green space, sitting areas, and space for bikes.

In some instances, the original typology of the building suited the change into residential use, as in the case of Corte Alfieri. Sometimes typological

challenges could not be addressed and compromises were needed: in both Palazzo Novecento and Torre GalFa, for example, it was not possible to add balconies for the benefit of residents, as the integrity of the historical façade took precedence. In both cases, however, external communal spaces were provided: two internal courtyards in Palazzo Novecento, and a new sunken square, replacing a parking lot, in Torre GalFa.

Where there were locational shortcomings—in the case of the more peripheral 5Square Via Antegnati—a more comprehensive planning intervention was needed to ensure that residents had access to services and amenities, and access to public transport was also carefully considered.

Regulations played an important part. In all four building conversions, the provision of minimum space standards is always ensured, and often also exceeded. A mix of flat sizes, including flats that can cater for families (from two to four beds) is provided. Attention is paid to the layout and orientation of flats: the Regolamento Edilizio in Milan, for example, does not allow flats that are bigger than 60 square metres to be single aspect and oriented towards the north, to guarantee a better exposure to natural light. For the same reason, the Regolamento Edilizio in Turin does not allow flats to be built solely in the basement, and Palazzo Novecento includes some duplex flats that span the

basement and ground floor. Regulations also require the provision of external open spaces (present in all four conversions) and of spaces for storing bikes (in Turin).

In some instances, however, regulations were too rigid and ended up detracting from the overall quality of the intervention. In Corte Alfieri, for example, the *Regolamento Edilizio* impeded the modification of the skyline, preventing some of the units in the top floor from having a terrace, despite the limited disruption that would have resulted from them. In Torre GalFa, regulations did not allow any windowless bathrooms to be built in flats bigger than 70 square metres and this, coupled with the need to keep the modularity of the original façade due to its architectural value, constrained the overall internal space distribution and prevented some of the existing windows from being re-purposed for the flats.

Calls for flexibility in the use of regulation are frequent, with some questioning the ability of Italian local authorities to deal with new housing challenges through old norms and regulations, and asking for normative innovation.<sup>10</sup> We have also argued in the past that overly prescriptive standards can result in banal outcomes and undermine experimentations, and that regulation, in itself, does not guarantee good quality. However, we believe that it does prevent very poor-quality housing, of the type often being delivered by PDR in England, through the provision of a framework for good design; and that regulations that flex to accommodate different circumstances not only support the health and wellbeing of their inhabitants but can also deliver well designed homes. The Italian case studies show that high-quality housing can be extracted from the conversion of office buildings and that there are lessons that can be learnt and implemented in England.

### Lessons from Italian practice

The first lesson is that building typologies suited to conversion should be given precedence—including those that may have been previously in residential use and were converted to offices during the 20th century—as particular typological challenges, such as deep floor plates, substantially increase conversion costs. The bigger constraint for conversion is location: this cannot always be compensated for (without much broader planning intervention), and therefore the second lesson is that location should often be a deal-breaker. Thirdly, it is local planning, with housing colleagues, that needs to assess whether conversions will deliver good-quality, healthy homes in suitable locations; this is not a decision that can be left to the market alone.

Clear regulations, as noted above, have an indispensable role in supporting the delivery of good-quality healthy homes, with the recent joint APPG report<sup>5</sup> calling for the introduction of a minimum set of mandatory standards within the PDR route to conversion, and the inclusion of the TCPAs Healthy



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Palazzo Novecento, Turin

Homes Principles<sup>6</sup> within the Levelling-up and Regeneration Bill. But the Italian cases show that there also needs to be a meaningful dialogue between regulations and design, with design specialists being involved in building conversion and an emphasis on design competitions (architectural firms were involved in all the Italian case studies) so that innovative solutions can be found within flexible regulatory frameworks through negotiations with local authorities.

All of the Italian cases highlighted presented key regulatory, design and cost challenges. This is the simple reality with adaptive re-use. Where a building has locational potential, there may be value to be extracted through conversion. The buildings we examined in Italy were able to accommodate a mix of market and affordable housing while bearing the substantial costs of conversion. This happens where there is extractable value.

A critical challenge for PDR conversions in England is that some of the buildings have so little locational merit or extractable value that the removal of planning cost and the technical consent to undertake a very basic conversion, with little or no compensatory measures to make up for locational shortcomings, is the only conceivable way to make the projects viable. In the worst cases these become 'homes' to very vulnerable households, with rent costs met through the Housing Benefit system. There is perhaps a parallel with ex-Right to Buy properties sold from the 1980s onwards and now subdivided into bedsits by slum landlords. The difference with PDR is the direct role of the state in sanctioning this outcome.

There was a time when thoughtful and thorough housing quality frameworks sought to deliver decent and healthy homes in England. Much of the history of public housebuilding in England and the rest of the UK was accompanied by improving standards, most famously those standards that emerged from the Parker Morris Committee in 1961 and were applied to all housing built in New Towns in 1967 and extended to all council housing in 1969. The commitment to housing quality, and to the link between health and housing, has weakened since the 1980s.

The housing crisis, with its macro-economic roots, is viewed largely as a quantitative crisis. Too few homes are being built and those homes we have are often unaffordable. But the health aspect of the crisis is inseparable from rising costs. Affordability cannot be pitted against health outcomes, as it clearly has been with PDR over the past decade. Many of the conversions that happened in England during this period should not have progressed, and those that do in the future need to contribute to positive health outcomes.

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# environmental outcomes reporting — clearly inadequate, but does opportunity knock?

The new Environmental Outcomes Report provisions set out by the government as a post-Brexit replacement for Environmental Impact Assessment and Strategic Environmental Assessment/Sustainability Appraisal are, in their current form, a major step backwards—but there is still a chance that, if done right and pointed upstream, they could lead to systems-wide improvements for health and the environment, say **Daniel Black** and **Edward Kirton-Darling**

Whether or not the selection of the acronym was chosen to sound like Pooh's forlorn friend, Eeyore, we must assume not and not get too despondent about the Environmental Outcomes Report (EOR) provisions at this stage. The provisions form part of the Levelling-up and Regeneration Act (Part 6), and will replace the EU-derived system of SEA/SA (Strategic Environmental Assessment/Sustainability Appraisal) and EIA (Environmental Impact Assessment).

The government consultation on the proposals<sup>1</sup> argued that the new approach will put in place 'a streamlined system that focuses on delivering our environmental ambitions', while allowing the government to 'reflect its environmental priorities directly into plan-making and decision-making processes on the largest developments'.

The plans amount to a very significant change in the ways in which impacts of large-scale development are assessed, and in what follows we analyse aspects of the consultation, starting with two critical areas not fully addressed in the proposals—health-related outcomes and issues with the current regimes—before outlining and examining some of the specific issues raised in the consultation.

## **Health-related outcomes**

The failure to place health at the core of the impact assessment process is the most significant flaw with the proposals. While the consultation document does mention health explicitly and states that the 'purpose of Town and Country Planning is to deliver sustainable development, a cornerstone



**Table 1****Counter-rationales to the issues within the existing EIA and SA/SAE regimes identified by the government consultation**

Issue	Government rationale	Counter-rationale
<b>Inefficiency</b>	Need for early assessment, clarity and relevance of priorities.	Early assessment, clarity and relevance are all important, but so is full and comprehensive assessment.
<b>Duplication</b>	Overlapping with other assessments (for example inclusion of social, economic and housing matters).	Consideration of impact at a systems level is critical, especially when concerned with environment and health; by separating off each assessment, the whole is missed.
<b>Risk aversion</b>	Fear of legal challenge and resource needs, leading to delays.	The 'precautionary principle' is perhaps the most significant of environmental foundations, and yet is not mentioned once.
<b>Loss of focus</b>	Scope creep and lack of clear boundaries.	See the above point about duplication. Systems approaches also embrace inevitable 'fuzzy boundaries' and, when reasonably applied, should improve overall efficiency.
<b>Issues with data</b>	Poor accessibility, robustness and quality of data, leading to delays; significant volume of data, but often not the right type; data held in a variety of places; quality assurance concerns.	Data limits are inevitable, especially on health and environmental outcomes, but that should not prevent decision-making that prioritises them.

of which is improving the health and wellbeing of communities', it is notably absent from the detail of the planned reforms. The only reference is in two—arguably weak—statements of intent: 'reforms will allow us to consider how best to address the environmental effects of development on communities, covering issues such as the health of local people'; and 'We will also consider how we can best use EORs to achieve health related outcomes'.<sup>1</sup> This failure to place health front and centre is a clear cause for concern, but also presents a clear opportunity to strengthen the proposals.

### Issues with the current regime

The consultation identifies five issues that 'users' (it does not specify who in any detail) have with the existing EIA and SA/SAE regimes, and presents rationales for the proposed change. However, while these issues are all reasonable and justifiable, the analysis set out in the consultation fails to highlight important counter-rationales; illustrations of which are set out in Table 1.

The impact of the approach taken is that the consultation risks producing a system in which an emphasis on speed and streamlining comes at the expense of careful consideration of the nuances of an individual site. Furthermore, an opportunity to reduce box-ticking and encourage genuine assessment is missed.

### Principles—to guide the development of outcomes

The consultation document sets out six principles for the development of outcomes, which, although practical, do not adequately cover what is needed. We suggest that six additional principles are needed, as set out in Table 2 on the following page.

Town planning and infrastructure development are inextricably linked to public health,<sup>2,3</sup> and our health is dependent on our (local and global) environment health.<sup>4-6</sup> We agree with the consultation document that environmental (and health) challenges are complex, and hence there is a need for impact assessment upstream and at root causes. For example, land availability assessment and site allocations impact substantially on car use, which in turn impacts on health and environment; and regulation of real-estate investment can prioritise health and environmental outcomes via issues of affordability.<sup>5,7,8</sup>

While we agree that 'SEA has been expanded to include social and economic considerations' and that this 'has resulted in duplication and overlap'<sup>1</sup> in some instances, there are very significant inter-relationships between social, economic and environmental elements that require full consideration in the round. If elements are considered in isolation, linked issues can get missed—such as the health co-benefits of climate action.<sup>9</sup>

**Table 2****Six additional principles to guide the development of outcomes**

Government principles	Proposed additional principles
<b>Outcomes should:</b>	<b>Outcomes should:</b>
1 Drive the achievement of statutory targets and the Environment Improvement Plan.	1 Drive the achievement of human health outcomes.
2 Be measurable using indicators at the correct scale.	2 Be applicable to all plans at all levels, but focused especially at upstream/root cause factors to maximise efficiency, regardless of sector.
3 Be designed using the knowledge and experience of sector groups and experts.	3 Include social and economic impacts where they stem from environmental and health effects.
4 Have an organisation responsible for monitoring overall progress.	4 Be rooted in both the 'precautionary' and the 'polluter-pays' principles.
5 Be reviewed on a regular basis to ensure that they remain relevant.	5 Be designed using the knowledge of those affecting and those affected by development plans or projects.
6 Not duplicate matters more effectively addressed through policy.	6 Be applicable to both mixed-use places for people and large-scale, single-use infrastructure projects (these require different approaches).

Given the long-established enshrining of the 'precautionary principle' and 'polluter-pays principle' into environmental practice, it is remarkable, to say the least, that they are not included in the EOR proposals. We appreciate that they present issues of uncertainty and potential risk aversion, which the document seeks to address. They are nonetheless of fundamental importance, especially given the limited improvement from EIA through a reactive mitigation hierarchy<sup>10</sup> and the need to strengthen its first stage.<sup>11</sup>

Improving environmental and health outcomes is a complex challenge that requires working with incomplete data sets and unknowns: qualitative data, expert opinion, trust and transparency are needed, alongside new methods of decision-making under uncertainty. This is acknowledged in the consultation document: 'certain outcomes may not be conducive to a quantitative metric [...] agreed assessment methodologies that draw on qualitative assessment, using professional judgement, may have to be used'.<sup>1</sup> These methods need to be developed prior to enacting the new regime. Further clarity and detail are therefore needed to ensure early impact assessment at root-cause decision points, to enable strong policy and legislation, and efficient development where appropriate; and hence our recommended principle 2 (in Table 2), which principle 4 would also underpin.

When addressing the complex challenge of environmental degradation (and impact on human health), stakeholders involve both those affecting as well as those affected by development plans or projects.<sup>12, 13</sup> Not specifying the 'sector groups and environmental experts' or the 'organisation responsible for monitoring overall progress of specific outcomes'<sup>1</sup> is problematic, as the choices made here could lead to wildly varying outcomes. The process for

stakeholder identification and involvement must be clear and should include consideration of future generations and those with less 'voice'.

**Principles that indicators will have to meet**

The consultation document states that indicators must be:

- clearly and directly relevant to one or more priority outcomes;
- non-duplicative;
- proportionate;
- drawn from existing data sets;
- measurable at the correct scale;
- evidence based;
- replicable;
- owned and managed; and
- supported by a clear methodology and guidance.

While these are all common-sensical, they do not on their own give confidence. Significant lack of clarity remains, and—at the very least—clearer additional guidance will be needed.

For example, the consultation states on the one hand that the quality of data is often not of the type or standard required, yet at the same time says that the data must be drawn from existing data sets. This emphasis on existing data sets has significant implications. Evidence suggests that there is far more data on air pollution, for example, than on many more, no less important indicators (for example overheating).<sup>7, 14, 15</sup> We therefore agree strongly with the consultation statement above on the limitations of quantitative metrics and the need for qualitative assessment and professional judgement.<sup>1</sup> Yet there is no clear guidance on this.

The same section of the consultation paper also lists eight 'matters' for consideration: biodiversity;

air quality; landscape and seascape; geodiversity, soil and sediment; noise and vibration; water; waste; and cultural heritage and archaeology. It acknowledges that this list is incomplete, and says that it will be expanded 'through regime specific outcomes, in accordance with the specific legislative and policy framework, and pressures and needs, of each regime'.<sup>1</sup> However, there is a significant risk that critical environmental and health matters will not be picked up without clearer guidance. There is also the critical and often overlooked issue of unaddressed cumulative impact (i.e. many smaller developments going 'under the radar', leading nonetheless to significant impact).

In summary, in our response to the consultation we suggested an additional principle—that indicators must be 'sufficiently comprehensive to ensure full coverage of environmental and health issues, regardless of regime, and linked upstream factors'. Without such a focus, there is a significant risk that the evidence relied upon will be partial and incomplete.

### Principles—reporting and climate change

The consultation states that 'Each environmental assessment regime will be able to use the powers in the [Levelling-up and Regeneration] Bill to develop their own tailored approach to assessment'.<sup>1</sup> It is clear that this could potentially drive improvement, but also flags multiple unknowns and risks and has the potential to increase bureaucracy without achieving the stated environmental benefits. The consultation also states that applicants will 'report on the performance of projects or plans against all relevant outcomes on a proportionate basis',<sup>1</sup> but it is not clear how 'relevance' and 'proportionality' be determined.

In relation to climate change, the consultation asks how the government can 'ensure that EORs support our efforts to adapt to the effects of climate change across all regimes'.<sup>1</sup> At the outset, it is important to underline that this phrasing suggests that the focus is solely on adaptation (adapting to the effects of climate change), rather than mitigation (seeking to reduce its effects). While adaptation is critical, it goes without saying that mitigation is vital. Another issue relates to data, as raised above. We agree with the statement that 'Matters like climate change are not a single issue but complex network of interconnecting consideration. Climate change covers many different considerations and is not always directly, or effectively, measurable in itself'.<sup>1</sup> That being so, it is hard to see how this can be reconciled with the issues of incomplete data without further methodological developments.

Similarly, we would agree with the statement 'Matters of importance at the national, and international, scale such as climate change are most effectively addressed through strong legislation and policy'.<sup>1</sup> However, the consultation document appears to suggest that climate change (and other similar matters of importance) is being addressed

effectively through legislation and policy. Given significant evidence to the contrary, and the very significant risks, we suggest that there is a need for greater focus on impact assessment upstream.<sup>4, 5, 16</sup>

To illustrate the point, the consultation uses the National Planning Policy Framework (NPPF) and the Building Regulations as examples of where national policy is addressing climate change. However, while we welcome the recent and significant improvements to Part L (Conservation of Fuel and Power) and Part F (Ventilation) of the Building Regulations,<sup>17</sup> at the building level there are outstanding issues regarding air-tightness and ventilation,<sup>18</sup> as well as performance gap, unregulated energy, and embodied carbon.<sup>19</sup> The Building Regulations are also just one part of a much larger picture, and there is the outstanding issue of cumulative impacts from smaller developments.

In theory, the NPPF sets out what is expected, but in practice it is far from clear. Central issues, from an environmental outcomes perspective, are:

- the interpretation of what is 'sustainable'; and
- the lack of quantifiable data on socio-environmental outcomes and pathways to impact.

The net result is that quantifiable economic outcomes dominate the less easily quantifiable social and environmental outcomes.

On waste, it is encouraging that there is a waste focus in the transition to net zero, and a drive to focus on upstream waste management over recycling downstream, which our research has demonstrated can produce significant benefits.<sup>15</sup> However, there appear to be major structural barriers and perverse incentives encouraging waste,<sup>16</sup> and hence the need for impact assessment upstream at root cause.

### Scope

In relation to scope, the consultation acknowledges the need for better alignment between the strategic and the project scales and for navigable reports that avoid duplication, and it considers the assessment of 'reasonable alternatives'. However, it does not set out clearly how strategic and project assessment will be better aligned, and the analysis would benefit from a review of why 'assessment of cumulative effects has been challenging and ineffective, particularly at the project level'.<sup>1</sup> Overall, as with other sections of the consultation document, the approach to scope would benefit from clarification, but there are aspects of the analysis we agree with—for example, the length and complexity of reports is an issue, 'important details can be buried in technical appendices', and 'uncertainties in the science or data or in implementation are not clearly identified and not clearly expressed'.<sup>1</sup>

We also agree with the statement that 'Many find the size of reports daunting, methodologies difficult to follow and conclusions on the 'likely significance' of an effect subjective, vague and non-committal'.<sup>1</sup> Interestingly, however, while the work by Singh *et al.*<sup>20</sup> is cited in support of this statement, that same

paper also goes on to recommend that ‘the EIA process could be improved by adopting more rigorous assessment methodologies and empowering regulators to enforce their use’,<sup>20</sup> which appears at odds with the argument presented for needing a more simplified assessment through EOR.

### **Threshold (for requirement)**

Regarding the proposal to require environmental assessment for ‘all projects in, or partly within, sensitive areas such as protected sites’,<sup>1</sup> it is surprising that this is not seen as an essential bare minimum. It should not be the only criterion, given that protected sites cover only a very small amount of our environment: they are the last remaining vestiges of a highly depleted natural world, especially in the UK, and are not the only environmental issue.<sup>21</sup> It is also not clear how the following statement will be quality-assured: ‘the greater the potential impact on the environment [...] the greater the probability that the plan or project will require an environmental assessment’.<sup>1</sup>

The screening process is also not at all clear. A critical area to address is how effectively these issues are being addressed further upstream.<sup>5,7</sup>

### **Mitigation**

The mitigation section of the consultation document identifies a hierarchy of action: avoidance, mitigation, and compensation. This follows the same logic as the waste hierarchy—reduce, reuse, recycle—and we should expect the same results; i.e. recycling ends up receiving the most resources and attention (given systemic inertia tending towards business as usual), rather than reduction. In the same way, we should expect that compensation will end up being where most attention and resources go, rather than avoidance. First and foremost, therefore, the focus should be on addressing critical issues upstream, greatly reducing the need for mitigation (and compensation) downstream—but this is not emphasised, and how this is to be achieved needs focused attention.

At the moment, the discussion is limited. For example, the consultation document asks whether an adaptive approach is a good way of dealing with uncertainty—but by that point it is too late and only marginal mitigation is usually possible. The document suggests that such an approach is possible ‘in response to greater certainty on effects following implementation’,<sup>1</sup> but that would give licence to weaker action in advance, which has the potential for much greater inefficiencies.

### **Monitoring**

The consultation document asks whether we would ‘support a more formal and robust approach to monitoring’, to which the answer is, of course, yes. However, resourcing this should not be at the expense of preventing poor environmental outcomes

upfront. It is much better to prevent the harm in the first place than it is to monitor it after it has happened, and prevention would reduce ongoing costs of monitoring or issues such as post-decision costs and liabilities.

### **Data**

On data, the consultation document focuses on the sharing of data, at the expense of complex questions about inherent gaps in data and the limits of quantifiable data.

We agree that there is a ‘lack of relevant, accessible, robust and quality assured data’, and that although ‘a lot of environmental data’ exists it is ‘not necessarily of the type or standard required’.<sup>1</sup> We also agree that ‘interactions and inter-dependencies’<sup>1</sup> are critical—and not just between habitats and species, but across all elements (for example the impact of unhealthy housing, food and drink on health and environment). We also appreciate that ‘obtaining robust baseline data has been challenging’.<sup>1</sup> Given these issues with data, there is an urgent need for new methods to enable good decision-making under conditions of uncertainty.<sup>22,23</sup>

This links to the suggestions made above on the need for qualitative data and expert opinion. Although it comes with uncertainty, so too does quantifiable data. For example, there is significant and increasing evidence of the links between environmental degradation and human health,<sup>4</sup> and we are aware of very significant future risks from the climate and biodiversity crises, but the full range of these impacts are still unknown and we cannot predict or quantify them easily, particularly in relation to piecemeal project development.

Given the issues with data, it is not always the case that it will ‘deepen our understanding of the state of the environment’<sup>1</sup>—it depends on what data is available and how the overall picture is balanced with a clear understanding of unknowns.

The consultation also asks what data should be prioritised for the creation of standards to support environmental assessment. However, every context is different, and so to prioritise certain environmental data sets would be to miss the bigger picture. We would suggest that the premise that ‘the evidence needs of assessment can be large, so we will need to prioritise certain data sets’<sup>1</sup> should not be the case. If a proxy data set is essential, the decision on the simplification of data would need to be from a balanced view taken by *trusted* experts, as well as those affected by the proposals (including those with limited ‘voice’ and future generations).

### **Conclusion**

There is much that is unclear in the consultation, and there are some fairly straightforward ways in which the provisions could be improved—not least



by prioritising and defining health, by including and clarifying critical foundational principles, and by developing gaps in methodology identified above. This will take some work, but for the outcomes to be better—which is the stated purpose of EORs—this work is evidently essential. To borrow and adapt from Eeyore: ‘It’s not much of an environment that we have left, but we are sort of attached to it.’

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## Notes

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# towards net-zero-carbon housing — local authorities' adoption of higher energy efficiency standards and performance metrics

Drawing on discussions at a practitioner roundtable, **Richmond Juvenile Ehwi**, **Katy Karampour** and **Gemma Burgess** consider local authority progress towards the goal of net-zero-carbon new housing

In recent times, the world has been marked by a surge in extreme weather events, from unrelenting rains and scorching heatwaves to devastating wildfires and widespread flooding. These alarming phenomena serve as stark reminders of the escalating consequences of climate change,<sup>1</sup> casting a pressing imperative on nations to confront the challenges posed by a warming planet.

The UK was the first developed nation to set a legally binding commitment to reduce carbon emissions by passing the Climate Change Act of 2008.<sup>2</sup> While carbon emissions vary across sectors in the UK, buildings are thought to contribute 20% to the UK's carbon footprint, of which residential buildings account for over 70% of the emissions.<sup>3</sup> As the UK steers toward its ambitious goal of achieving net-zero carbon emissions by 2050, the decarbonisation of these residential buildings emerges as a pivotal intervention to actualise this commitment.<sup>4</sup>

Driven by this commitment, the UK Government has taken measures to, among other things, ensure that new homes are future-proof with low-carbon heating and high levels of energy efficiency. These

include the planned introduction of the Future Homes Standard coming into force in 2025, an update to Part L (Conservation of Fuel and Power) and Part F (Ventilation) of the 2010 Building Regulations, the publication of the Heat and Buildings Strategy,<sup>5</sup> and a number of funding schemes, such as the Social Housing Decarbonisation Fund.<sup>6</sup> This notwithstanding, the government admits that these interventions have taken a high-level focus, leaving no clear and concrete policy direction regarding their implementation at the local level. This has resulted in a lack of clarity regarding the role of local planning authorities in setting local energy efficiency and sustainability standards.<sup>7</sup>

Meanwhile, the Planning and Energy Act 2008 empowers local planning authorities in England and Wales to set energy use and efficiency requirements that exceed current Building Regulations.<sup>8</sup> Thus, in the midst of uncertainty, some local authorities are adopting energy efficiency standards and performance metrics believed to be higher than requirements in the 2010 Building Regulations. However, it is unclear what these new performance metrics are, and there are few case studies of new housing developments

where local authorities have adopted these higher energy efficiency standards and applied new performance metrics. There are also limited empirical insights into the opportunities and challenges associated with adopting higher energy efficiency standards and new performance metrics.

This article attempts to fill these gaps by sharing insights that can help to inform ongoing discussions on the imminent Future Homes Standard, as well as provide guidance for local authorities and other built environment professionals engaged in development schemes that aim to achieve zero carbon.

## Methodology and data

This article draws on insights gathered from an online roundtable discussion designed to gather practitioners' perspectives on the role of planning in delivering net-zero-carbon new housing. The event was organised by researchers at the Cambridge Centre for Planning and Housing Research, in partnership with the Greater Cambridge Shared Planning service and Cambridge Ahead. The event attracted 49 professionals from the built environment, including planners from both local authorities and private practice, housebuilders, architects, contractors, sustainability consultants, and academics.

Three planning officers, representing Greater Cambridge Shared Planning, Norwich City Council and the London Borough of Barking and Dagenham, who have experience in the delivery of new housing projects that achieve higher energy efficiency and adopt new performance metrics, presented case studies of such projects. This was followed by a moderated discussion which explored, among other things, the opportunities and challenges associated with adopting higher energy efficiency and sustainability standards in new housing projects.

Finally, this article draws some insights from provisions in new Local Plans of some local authorities that mandate higher energy efficiency and performance metrics beyond current Building Regulations. The research findings are summarised below.

## Findings

### ***New energy performance metrics adopted in net-zero homes across local authorities***

In the evolving landscape of climate consciousness, many local authorities are challenging the adequacy of the carbon reduction mandates outlined in the 2010 Building Regulations. In pursuit of a net-zero-carbon future, it becomes evident that a more comprehensive assessment of building performance is required. This holistic approach not only encompasses energy efficiency but also embraces low-carbon heating sources and renewable energy generation. Indeed, a technical feasibility report on net-zero-carbon evidence base for the Greater Cambridge Local Plan 2021<sup>9</sup> argues that, for any building to be considered

zero carbon, its performance must be assured against three separate aspects of new buildings, namely:

- energy efficiency, measured by space heating demand—15–20 kilowatt-hours per square metre per year (kWh/m<sup>2</sup>/year) and metered energy use (around 35–65 kWh/m<sup>2</sup>/year);
- low-carbon heating in terms of space heating and hot-water generation without combustion of any carbon-containing fuels; and
- use of renewable energy which should be at least equal to the energy use of the building, using solar photovoltaic panels, or off-site renewable energy.

Through collaborative efforts with influential bodies such as the Climate Change Committee (CCC), the Royal Institute of British Architects (RIBA) and the Low Energy Transformation Initiative (LETI), select local authorities have adopted a suite of energy performance metrics, benchmarks and standards endorsed by these entities. This strategic alignment with established institutions augments their commitment to decarbonise the built environment and fortify the sustainability of new homes. Notable among these metrics are:

- **Space heating demand:** This metric measures the energy required to heat a home annually. Ranging between 15 and 20 kWh/m<sup>2</sup>/year, it aligns with recommendations from the CCC and provides a tangible target for energy efficiency.
- **Energy use intensity (EUI):** A measure of the total energy consumption per square metre annually, EUI has been set at 35 kWh/m<sup>2</sup>/year. In adherence to the definition of net zero by LETI, this threshold signifies a significant stride towards carbon neutrality.
- **Energy balance:** Envisioning a future in which energy generation outpaces consumption, this metric aims for a positive energy balance. By matching energy generated to energy used over a year, this ambitious target paves the way for self-sustaining homes.
- **Embodied carbon:** Acknowledging the environmental costs of material production, benchmarks such as RIBA's 2030 Climate Challenge<sup>10</sup> aim for embodied carbon metrics of 800 kilogrammes of carbon dioxide equivalent per square metre (kgCO<sub>2</sub>e/m<sup>2</sup>) for 2025 and 625 kgCO<sub>2</sub>e/m<sup>2</sup> for 2030. These indices underscore the need for sustainable material choices.
- **Potable water use:** Reflecting the importance of water conservation, RIBA's 2030 Climate Challenge establishes goals of less than 95 litres per person per day for 2025 and 75 litres per person per day for 2030. These benchmarks drive a shift toward responsible water usage.

Insights from local authorities' plans reveal the integration of new performance metrics into planning policies, particularly in housing projects. For example, Central Lincolnshire's new Local Plan



**Housing development on the Fen Road and Ditton Fields site at Cambridge**

review emphasises a space heating demand of 15–20 kWh/m<sup>2</sup>/year and a total energy demand of 35 kWh/m<sup>2</sup>/year. This policy underscores a fabric-first approach to construction to achieve an optimal energy balance.<sup>11</sup> Similarly, Cornwall's new Policy SEC1—Sustainable Energy and Construction highlights the maximisation of renewable energy generation and connection to low-carbon district energy networks or contributions to Cornwall Council's Offset Fund when on-site renewables are not feasible, as outlined in the council's *Climate Emergency Development Plan Document*.<sup>12</sup>

Case studies of ongoing projects further validate the application of these metrics. In Cambridge, the Fen Road and Ditton Fields project,<sup>13</sup> featuring 18 low-carbon council homes, embraces the Passivhaus standard, employing off-site manufactured timber frames. These homes will achieve a space heating demand of 15 kWh/m<sup>2</sup>/year through air-source heat pumps and photovoltaic panels.

Similarly, Norwich's Goldsmith Street project,<sup>14</sup> featuring 105 social housing units (and winner of the 2019 Stirling Prize), adopts the Passivhaus standard and uses metrics from Norwich City Council policies such as those on operational energy, embodied carbon, and potable water use. The project boasts an operational energy of 16 kWh/m<sup>2</sup>/year, embodied carbon of 311 kgCO<sub>2</sub>e/m<sup>2</sup>, and potable water use of 101 litres per person per day, all aligned with the referenced policies.

A further significant development is the Gascoigne Neighbourhood in Barking and Dagenham,<sup>15</sup> providing 3,500 new homes. It adopts a fabric-first approach, achieving impressive carbon emission reductions. Phases 1 and 2 reached 38% and 42% carbon emission reductions, respectively, compared with Part L of the 2013 Building Regulations, as stipulated

in London Borough of Barking and Dagenham policies. Phase 3 is projected to achieve an 86% reduction. The transition from a gas-fired district heating network to heat pumps is expected to reduce carbon emissions from 93 to 64 tonnes of carbon dioxide per year, following the prescribed guidelines. Moreover, many of the homes will feature mounted photovoltaic panels.

#### ***Opportunities and challenges associated with adopting and implementing higher energy efficiency standards and performance metrics***

Setting and enforcing higher energy efficiency standards and outlining new performance metrics to capture low-carbon energy locally brings both advantages and difficulties, as explored below.

The **opportunities** offered include:

- **Opportunity to mandate higher energy efficiency standards in the NPPF:** While there is a legal basis for local authorities to establish individual low-carbon energy and sustainability standards, this practice could result in uneven development. Developers who might be adversely affected by higher energy efficiency and sustainability standards in some local authority areas might avoid investing in such areas. Thus event participants believed that there must be room for the National Planning Policy Framework (NPPF) to incorporate specific provisions emphasising the need for Local Plans to require higher energy efficiency standards and performance metrics in new homes. This approach would discourage developers from directing their projects to areas with low energy efficiency standards, thereby contributing to the reduction of existing inequalities in economic opportunities across different local areas in the country.





Homes at Goldsmith Street, Norwich

● **Opportunity for greater project involvement and quality assurance:**

This is particularly relevant when local authorities act as clients in new housing projects. For instance, in the case of the Goldsmith Street project in Norwich, three local housing providers initially selected to execute the scheme under design and build contractual arrangements withdrew. Consequently, Norwich City Council transitioned to a traditional contract, affording it greater influence over project design, cost control, and build quality. The council subsequently engaged its design and conservation team to create the design brief and specification for the project. These documents were then used to select the architect and project contractor for the scheme. The comprehensive nature of the design brief and specification significantly contributed to the successful execution of the project. The council retained control of the project, and its design team remained actively involved throughout project delivery.

● **Opportunity to push the boundaries of local planning policies:**

Insights from the Goldsmith Street development underscore the challenges posed by meeting the council's target of 10% renewables for the new housing project. To address the obstacles here, a fabric-first approach, adhering to the Passivhaus standard, was proposed as an alternative method of achieving the renewable energy target. The council accepted the approach, subsequently incorporating it into local planning policy. Furthermore, the project successfully delivered 20 additional units on the site by negotiating for distances of 14 metres between residential developments, instead of strictly adhering to the 18–22 metres specified by the existing planning policy. This innovative adjustment

not only contributed to reducing carbon emissions from the council's social housing, but also helped to address part of the demand for social housing in the local area, ultimately reducing the council's waiting list.

● **Opportunity to share best practice:**

While some local authorities have already embraced higher energy standards, a significant number are contemplating following suit. However, the scarcity of well documented success stories, case studies and best practice advice is likely to discourage more local authorities from taking decisive action. Thus an opportunity arises for early adopters of higher energy efficiency standards and performance metrics to create a hub, platform, networking group or events through which they can share their experiences. Members of this platform, including local authorities and other professionals in the built environment, should be encouraged to share both successful and unsuccessful stories and lessons learned. This collaborative effort would help to dispel uncertainties, overcome hesitations, and reduce some of the transaction costs associated with the transition.

● **Opportunity to develop thought leadership globally:**

With more than 190 countries adopting the Paris Agreement,<sup>16</sup> over 1,000 cities joining the Cities Race to Zero campaign,<sup>17</sup> and more than 125 mayors from 31 countries committing to urgent climate actions,<sup>18</sup> the pursuit of net zero by 2050 is a widely shared global vision. This presents local authorities in the UK that have embraced higher standards of energy efficiency and performance metrics with an extraordinary opportunity. They can offer thought leadership, act as external consultants to city leaders in other



Part of the Gascoigne Neighbourhood, London Borough of Barking and Dagenham

countries, and forge collaborations to facilitate the dissemination of best policies and practices internationally.

The **challenges** from adopting and implementing higher energy efficiency standards and performance metrics include:

- **Tensions between achieving higher energy efficiency standards and project viability:** There was recognition at the event that some developers have expressed concerns that delivering new homes to higher energy efficiency standards results in significant increases in building costs. This directly impacts project viability and hence disincentivises investments in new homes that aim to achieve zero-carbon status. While acknowledging the validity of this argument, it was contended that recent modelling aimed at providing evidence on the energy performance of zero-carbon homes, conducted by local authorities and professional groups including the Greater Cambridge Shared Planning service and the Task Force for the Future Homes Standard, demonstrates that, in the short term, the higher build costs associated with adopting higher energy efficiency standards in net-zero new homes are compensated by savings in households' expenditure on energy bills (electricity, heating) and water. Additionally, in the long term, these costs are further offset by significant reductions in maintenance expenses when compared with houses built to comply with current Building Regulations.<sup>19</sup>
- **Limited in-house capability to drive change in energy transitions:** Event participants largely agreed that many local authorities lack a sufficient number of officers with technical training in energy transitions, especially in areas related to the development of energy efficiency metrics and

sustainability standards. Consequently, given the updates to Part L of the 2010 Building Regulations and the impending enforcement of the Future Homes Standard in 2025, an opportunity arises for local authorities to invest in the development of in-house capabilities focused on energy transitions. This investment would empower them to effectively engage with developers and independently evaluate the designs of new housing schemes expected to achieve net-zero-carbon status.

- **Securing political leadership:** While there is some consensus among the leading political parties regarding the necessity of taking decisive actions to address the climate crisis, the approaches to achieve this goal vary. This divergence inevitably influences local political decision-making. Therefore any local authority contemplating the adoption of higher energy efficiency and new performance metrics must carefully consider how raising these standards will be perceived by the diverse political interests represented at the local level. Ensuring their buy-in and support in adopting these standards within local planning and policy-making is a complex endeavour, demanding dialogue, persuasion, and reasonable compromises.
- **Potential disparity between design performance and actual building performance:** While most certification bodies, such as the Passivhaus Trust, subject the design and construction of zero-carbon and high energy efficiency homes to rigorous testing protocols that assess aspects such as ventilation, solar shading, heat loss, air-tightness, and insulation, there remains the possibility of disparities between the projected performance of newly constructed homes and the actual performance experienced by occupants after moving in. At times, these disparities arise owing

to erroneous assumptions about occupants' behaviour within these new homes, among other factors. Consequently, there are calls for the inclusion of post-occupancy evaluation (POE) as either a mandated requirement or an integral component of the final certification process for these new low-carbon-energy homes.

## Conclusion

In the face of escalating climate change concerns, local planning authorities are stepping into new roles that extend beyond traditional responsibilities. This article has showcased the determined journey of local authorities towards achieving net-zero-carbon housing through the adoption of higher energy efficiency standards and new energy performance metrics. The findings presented here underscore the growing momentum behind these initiatives, with local authorities embracing collaborative partnerships and policy changes.

As local authorities push forward, their efforts hold the potential to transform not only the housing sector but also the entire landscape of urban and rural planning. The challenges highlighted are not deterrents but rather catalysts for a meaningful change that necessitates resource allocation, industry collaboration, and transparent communication. The transition towards net-zero-carbon housing demands the alignment of political interests, technical expertise, and community engagement.

Looking ahead, the path paved by these local authorities is likely to set a precedent for similar initiatives globally. As more cities, towns and regions confront the climate crisis, the lessons learned from these pioneers will shape a new era of sustainable and resilient urban development. The role of local planning authorities must continue evolving to drive comprehensive changes that align with the urgent need to secure a sustainable future.

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## Notes

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# green space and environmental justice — a new metric to guide resource allocation

**Humera Sultan, Nick Grayson, Stephen Jones, David Pike, Sarah Greenham, Debbie Needle, Jon Sadler and Emma Frew** outline how a new metric — the Environmental Justice Index — has been developed to help guide the use of Birmingham City Council resources directed at improving the amount and quality of green space in areas in most need

Connecting with nature is critical for health and wellbeing, as is reflected within a range of policy initiatives, such as the United Nations' Sustainable Development Goals and, in the UK, the *Nature for People Climate and Wildlife* policy paper,<sup>1</sup> the Nature Recovery Green Paper,<sup>2</sup> and the National Policy Planning Framework.<sup>3</sup> Green spaces are important places for contact with nature, and access to good-quality green space is a wider determinant of mental and physical health and wellbeing.<sup>4</sup> Such spaces offer opportunities for stress relief, physical activity, time away from environmental stressors, and social interaction,<sup>5,6</sup> and exposure to green space can help in reducing mortality and morbidity from chronic disease, including obesity.<sup>7</sup>

Despite the well known benefits of green space, the UK, like many developed countries, has seen significant declines in the natural world.<sup>8</sup> Fewer plant and animal species are being recorded than ever before, with the UK holding onto only 50% of its biodiversity since the Industrial Revolution began in the 18th century.<sup>9</sup> Loss of nature is significantly linked to the global climate crisis, and the Intergovernmental Panel for Climate Change's Sixth Assessment

Report, issued in February 2022, highlights how important nature-based solutions are in tackling the climate crisis.<sup>10</sup>

Urban green space has been identified as a key part of achieving environmental sustainability goals, and the European Union's Biodiversity Strategy for 2030<sup>11</sup> emphasises the importance of bringing nature back into cities. Birmingham, the second-largest city in England, is seeking ways to tackle the nature crisis. With just over 1.1 million residents, it is a diverse city in terms of ethnicity, deprivation, and culture, and Birmingham City Council is also Europe's largest local authority, with 69 electoral wards, broken down further into 639 Lower Super Output Areas (LSOAs).

The council has responsibility for over 600 green spaces (including parks and cemeteries) and over 7,000 allotments, overseen and managed by the council's parks services. Since February 2022, Birmingham has committed to becoming a 'City of Nature', with the council endorsing a 25-year plan<sup>12</sup> to achieve this end. The council recognises nature's importance in health and wellbeing, and its role in the local net-zero plan,<sup>13</sup> which focuses upon the





**Open space in Birmingham—Witton Lakes**

council and the city becoming carbon neutral by 2030.

Although a figure of 600 green spaces seems impressive, the distribution of these spaces is inequitable. The city requires another 400 hectares of green space if it is to meet the current Birmingham Development Plan target of 2 hectares of green space within 1 kilometre of any person's residence<sup>14</sup> (currently, there is no mandated national standard for access to green space). It is notable that the least green space is available in those areas that need it the most—an example of the infamous 'inverse care law', first posited by doctor and researcher Julian Tudor Hart.<sup>15</sup> The evidence base around the impact of green space on health and wellbeing and community cohesion is growing,<sup>5,6</sup> and the communities that are most disadvantaged, and have greater health needs, tend to have less access to green spaces, be that as private gardens or public spaces.<sup>16</sup>

Birmingham City Council is seeking to address this imbalance in access to high-quality green space through its 25-year *Our Future City of Nature Plan*,<sup>12</sup> and thus sought an effective metric to guide the use of resources available for improving the amount and quality of green space in areas in most need and track progress against the implementation of the 25-year plan—one that fully encapsulates the goal of restoring nature and ensuring the provision of high-quality green space for all residents. It calls this metric the 'Environmental Justice Index' (EJI)—'environmental justice' being a term that comes from a social movement that seeks 'the fair treatment

and meaningful involvement of all people regardless of race, ethnicity, income, national origin or educational level with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies'.<sup>17</sup>

This article outlines the methods used in developing this index, the progress made, and, importantly, how it has been applied within a local authority setting to help prioritise those areas most in need of nature restoration and inform progress. It also considers the advantages and disadvantages of taking such an approach.

### **Organisational and economic context**

In England, the national budget available to manage green spaces has declined by £190 million over the period 2016–2021, and staff numbers have decreased by 32%, 2014–2021.<sup>18</sup> Local authorities have been tasked with making 'savings' because of significant reductions in core funding from the national government. In addition, in contrast to many other local authority service areas there is no minimum national standard for the quality of green spaces—making parks an easy target for budget reduction, which in turn impacts on the delivery of environmental justice.

The City of Nature team at Birmingham City Council has therefore created its own Future Parks Standard,<sup>19</sup> which assesses the quality of all green spaces, starting in those areas in most need identified using the EJI. Action plans for parks identified as not meeting the standard have been developed to improve the quality of the green space available.

## Development of the Environmental Justice Index

The EJI was developed from geospatial analysis using five readily available data sets, on:

- access to green space;
- the urban heat island (UHI) effect;
- flood risk;
- excess years life lost (YLL); and
- the Index of Multiple Deprivation (IMD).

The geospatial analysis was performed using ESRI ArcGIS.<sup>20</sup> ArcGIS uses 'rasters', which are spatial data models or a matrix of cells (or pixels), organised into rows and columns (or a grid). Each cell contains a value representing information, such as temperature. A snap raster was used within the ArcGIS geoprocessing environment (the UHI raster was chosen), in order to avoid any re-sampling during all raster data analysis. The nominal raster cell size was 20 metres, and all data was in the British National Grid.<sup>21</sup>

### Access to green space

Data on green space were drawn from the green space layers in Ordnance Survey maps,<sup>22</sup> defined as:

- public parks or gardens;
- play spaces;
- golf courses;
- sports areas or playing fields;
- churchyards or burial grounds; and
- allotments or community growing spaces.

The criteria for analysis were:

- Only open green spaces greater than 2 hectares were to be included.
- A target threshold distance from the analysis cell to green space was set at 1,000 metres.

A size of 2 hectares at a distance within 1,000 metres were both needed to qualify as access to green space.

### Urban heat island

The 2014 daily mean urban heat island intensity, at 1 kilometre resolution, was derived from the relationship between the Birmingham Urban Climate Lab (BUCL) urban observation network and Global Human Settlement (GHS) built data (based upon the work of Basset *et al.*<sup>23</sup>).

The raster values used were the daily (i.e. combined day and night) UHI levels in degrees Celsius. A relationship between the urban fraction (the proportion of land classed as urban) and UHI from the stations in the BUCL network was calculated, and then applied across the UK, weighted by urban fraction and the mean wind speed for each grid cell. As the original UHI calculation uses rural references from the BUCL network, a UHI value of 0 in the data effectively meant that cell is 100% rural. Using the maximum value for the UK (the most urbanised

value), the Birmingham data were normalised into the range 0–1, where 0 is considered good and 1 poor.

### Flood risk

Flood risk data were derived from the Department for Environment, Food and Rural Affairs (Defra) Flood Zones 2 and 3 maps. Flood Zone 2 encompasses land assessed as having a 1 in 100 to 1 in 1,000 annual probability of river flooding (1%–0.1%), or between a 1 in 200 and 1 in 1,000 annual probability of sea flooding (0.5%–0.1%). Flood Zone 3 encompasses land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%), or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%).

The two polygon feature data sets were merged into a single polygon feature class with an attribute to indicate the flood zone type. Using the ArcMap Polygon to Raster tool, the polygon features were converted to a raster of 20 metre cell resolution. Flood Zone 2 areas were given a value of 0.5 and Flood Zone 3 areas a value of 1.0. No data cells were given a value of 0.

### Excess years life lost (YLL)

Excess YLL figures were calculated by the council's Public Health Division in May 2021 using data sourced from the Office for National Statistics (ONS) annual deaths data for the period 2012–2017, NHS Vital Statistics VS3 Tables for the period 2012–2017, and ONS annual population estimates for Birmingham (2011 LSOAs) and England for the period 2012–2017.

Excess YLL were based on deaths aged 1–74 years from all causes split by the 639 Birmingham LSOAs in 2011. In ArcMap the excess YLL value was merged with a polygon feature set of the ONS 2011 LSOA using the LSOA code. Using the ArcMap Polygon to Raster tool, the LSOA polygon features were converted to a raster of 20 metre cell resolution. The raster cell values were then normalised into the range 0–1 by dividing the excess YLL cell value by the maximum excess YLL at city (Birmingham) level. The closer the value to 1, the higher the excess YLL value for that area.

### Index of Multiple Deprivation (IMD)

In ArcMap, IMD data, measuring relative deprivation in LSOAs, were merged with a polygon feature set of the ONS 2011 LSOAs using the LSOA code to create a new feature class. A new calculated field was added that converted the IMD decile value into a percentage value by multiplying it by 10. Using the ArcMap Polygon to Raster tool, the IMD LSOA polygon features were converted to a raster of 20 metre cell resolution. The raster cell values were then normalised into the range 0–1 using the formula  $(100 - \text{IMD percentile value})/100$ . A cell with a value of 0 would thus be the least deprived, and 1 the most deprived. This is the reverse of the

**Table 1**

**Minimum, maximum, mean and standard deviation values for the rasters for each data set and for the combined index**

	Minimum	Maximum	Mean	Standard deviation
<b>Access to green space</b>	0.000	1.000	0.118	0.193
<b>UHI</b>	0.000	0.616	0.248	0.185
<b>Flood risk</b>	0.500	1.000	0.804	0.244
<b>IMD</b>	0.027	1.000	0.700	0.261
<b>Excess YLL</b>	0.000	1.000	0.351	0.152
<b>Combined index (EJI)</b>	0.025	0.721	0.309	0.106

normal IMD, where a higher IMD value or decile indicates less deprivation.

#### **Data analysis, final output, and sensitivity testing**

The five data sets used as inputs for the EJI had cell values in the range 0–1, where 0 was considered the most preferable/of least adverse impact, and 1 the least preferable/of highest adverse impact. The ArcMap Raster Calculator tool was used to perform map algebra using the five input data sets by combining them as follows:

$$(\text{Green space} + \text{Flood risk} + \text{UHI} + \text{YLL} + \text{IMD})/5$$

The resulting combined index ranged from 0 to 1, with 0 being the most preferable/of least adverse impact and 1 the least preferable/of highest adverse impact combination of all the five factors.

The final output of the analysis was the EJI value by ward, processed using the ArcMap Zonal Statistics as Table tool to calculate the mean cell values which fall within a 'zone'. In this case, the ward polygon feature is the 'zone', and the output table was then linked back to the ward feature class in order to display the mean value by ward.

To better understand the extent of each parameter's influence on EJI scores, a sensitivity test was performed in the form of a correlation matrix. This showed, in statistical terms, the relationships between the data layers. For each layer, all the 20 metre cells within the council's administrative boundary were exported, and each layer's data were output according to its grid co-ordinates. Correlation testing was carried out using this exported data, comprising 669,261 total observations for each underlying layer of the EJI, where each observation reflects a 20 metre cell.

#### **Spatial difference in EJI values across Birmingham**

The spatial distribution of the EJI values across the city was examined by comparing scores for different wards across the spectrum of their EJI values. Five wards were randomly selected, one from each quintile of the EJI score, and the distribution of their EJI scores and the underlying data layers were analysed. This made it possible to

ascertain whether an EJI value was equally distributed throughout the ward, the factors that may be the underlying drivers of EJI values, and whether the spatial distribution of the underlying drivers is similar where there is greater or less environmental justice within a ward.

The 20 metre resolution raster data (five layers, plus the total EJI scores) were exported for each randomly selected ward to build the necessary charts for analysis.

#### **Results**

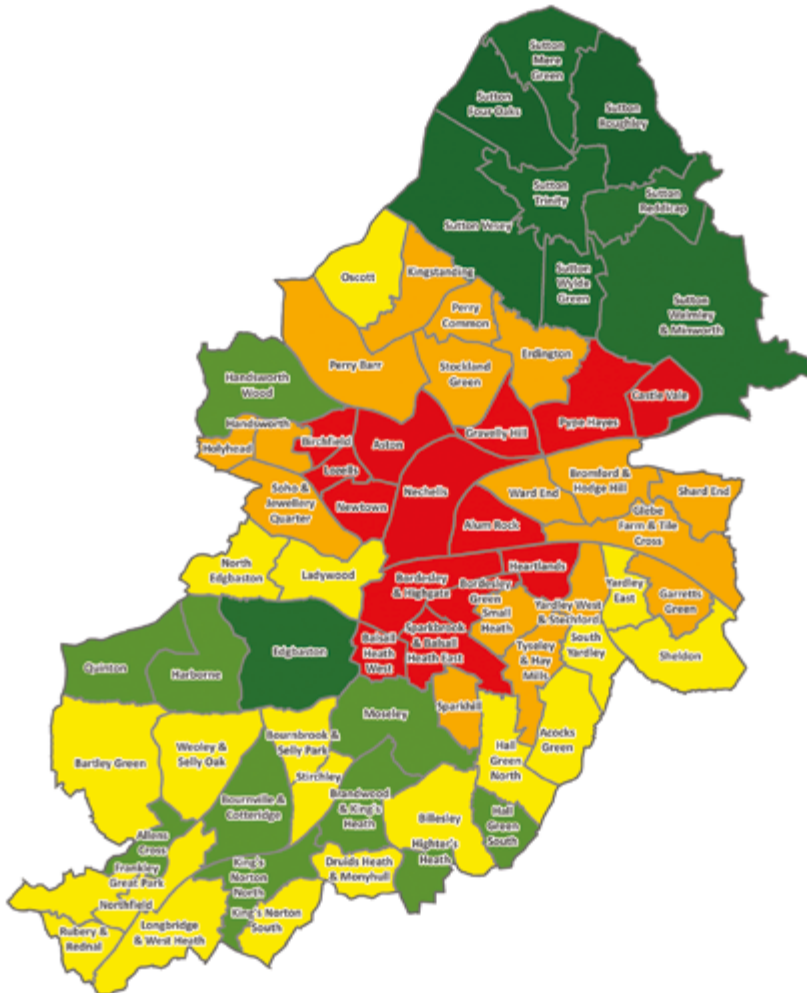
Table 1 shows the minimum, maximum, mean and standard deviation values for the rasters for each data set, and for the combined index. Fig. 1, on the following page, maps the combined index scores across the 69 Birmingham wards.

Of note within the map is that the 14 wards in red with the worst environmental justice scores are also in urgent need in terms of poverty, employment, obesity treatment and prevention, educational attainment, and other indicators of health and wellbeing. A focus on nature and environmental injustice thus also creates an opportunity for housing, children's services (schools, early years, employment, and children in care), public health and inclusive growth initiatives to come together and focus efforts on particular parts of the city in a collective manner, calling for action from the whole of the local authority and not just one department. Critically this process has also highlighted, for decision-makers to see, that many of these historic issues have direct links to the city's fight against climate change, which could potentially help to bring in new resources, both financial and human.

#### **Correlation of EJI data layers**

Fig. 2, on page 415, presents the correlation matrix for the underlying EJI data layers, showing the relationships between each pair of data layers. It is particularly notable that, where there is greater access to green space, UHI, excess YLL and IMD scores tend to be lower. As the other variables correlate positively with one another, the results statistically highlight the potential for greater access

### Combined index by ward – mean value

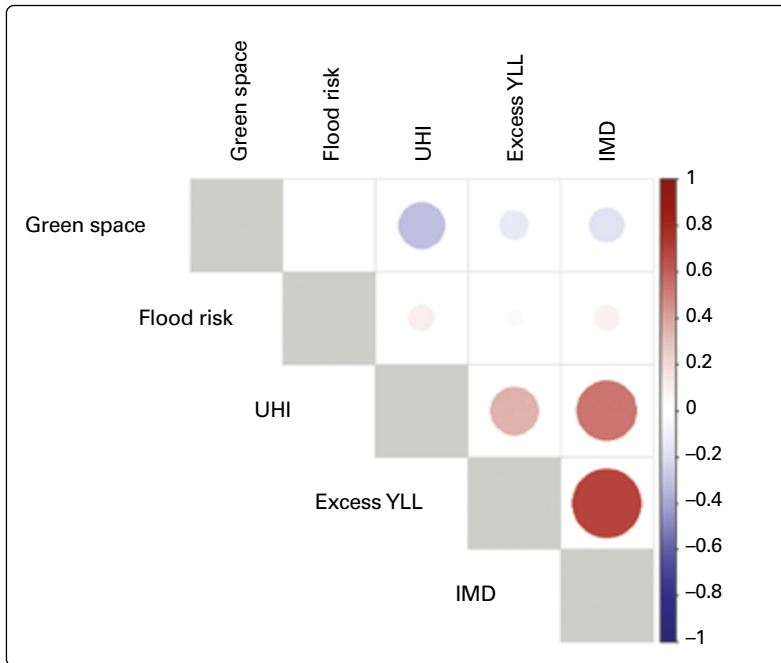


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 Ordnance Survey Open Greenspace layer derived information.  
 Ordnance Survey 100021326.  
 2014 mean daily urban heat island intensity (°C) at 1 km resolution  
 derived from the relationship between the BUCI urban  
 observation network and GHS-built data, R Bassett et al. 2020  
*Environ. Res. Lett.*, 15(11), 114014 <https://doi.org/10.1088/1748-9326/abb51>  
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 Produced by the Birmingham City Council Geospatial Team.



Fig. 1 EJI map of Birmingham, by ward





**Fig. 2 Correlation matrix showing the relationships between each data layer pairing for all the underlying 20metre data**

The larger/redder the circle, the stronger the positive correlation between the two layers; the larger/bluer the circle, the stronger the negative correlation between the two layers

to green space to improve social and environmental outcomes for Birmingham residents as a secondary effect. On the other hand, the highly variable relationships between all the EJl's underlying data layers highlight the complex and interrelated factors underpinning environmental injustice across Birmingham, which could perhaps include more factors than those used to design the EJl.

### Spatial distribution of EJl scores

Five wards across the Birmingham City Council area were randomly selected, one from each quintile of mean EJl score. The selected wards are shown in Table 2, on page 417. Based on these ward mean values, and the rest shown in Fig. 1, it was clear that the EJl scores are not normally distributed. The middle three quintiles are similar in value and skew towards higher EJl scores. There is therefore a notable contrast in the wards with the lowest EJl relative to the rest of Birmingham.

While the mean ward EJl scores do not show which layer or layers influence them, there are some notable observations to be made from the box plots in Fig. 3, on page 417. First, they show the largest divergence between the lowest-quintile ward scores relative to the other quintiles, which is further emphasised by the larger number of observations in this ward. Furthermore, there is a broader distinct pattern, in that there are higher scores where there are fewer 20metre data point observations within the ward.

The IMD and excess YLL box plots show the most similar trends, which also reflects in their strong positive correlation in Fig. 2. The highest-quintile (quintile 5) ward (Castle Vale) shows the smallest

distribution in interquartile range for both these layers, as well as for UHI, although quintile ward 4 (Kingstanding) shows the highest UHI interquartile range. The quintile 5 ward also shows the greatest flood risk across the ward, which is a likely factor affecting its overall EJl score. On the other hand, the quintile 1 ward (Sutton Roughley) is the only ward showing any lack of access to green space, but it is not of a score or distribution that is sufficiently high to greatly affect the overall mean EJl score.

### The impact of using the EJl

Although the development of the EJl is recent, it is already showing signs of having traction within Birmingham City Council, leading to changes in local policy. The City of Nature team has assessed all the parks located within six wards identified as 'red' against the Future Park Standard and developed associated action plans. The funding to support these plans has been agreed by the council's Cabinet, and is coming from the Community Infrastructure Levy—a first for this local authority.

Given the evidence-based nature of the approach, the City of Nature team has been given a mandate to engage with agencies beyond the local authority, to support the council's plans to restore environmental justice in Birmingham. This has led to the creation of the City of Nature Alliance (CoNA), made up of a range of Birmingham-based green and community organisations and third-sector organisations, who are now collaborating in a far more strategic way.

The first ward to benefit from the EJl was Bordesley and Highgate ward, which had an EJl score of 0.40. To deliver City of Nature actions at a site level, an audit was conducted for five parks in

the ward against the Future Parks Standard. A plan for action was created to raise the standard of each park to the minimum required within 12 months. Five organisations from the CoNA were successful in gaining small grant funding to carry out actions from the plan. Rather than focusing their resources on distinct parts of Birmingham, they worked collaboratively to make Bordesley and Highgate a greener place in which to live.

Examples of the type of action taken included engaging communities around each site using on-site notice boards to display posters, face-to-face surveys, and social media; improvements to amenity infrastructure, along with habitat creation to increase biodiversity; and organised healthy activities at each site, including sports for young people and sensory walks. Local schools were involved through nature-based activities delivered in schools. All the sites were re-audited in a 12-month follow-up, and the social impact was measured to ensure that the minimum standard had been achieved.

## Discussion

This article has reported on the development of an Environmental Justice Index and how it was implemented to provide decision-makers with guidance on prioritising environmental intervention. This is important, as addressing the challenges of environmental justice requires a whole-local-authority response. The areas in which questions of environmental justice are prominent tend to be the same areas in which the need for climate risk management is the greatest—and they would benefit from improvement to the six ‘capitals’ set out within the government’s ‘levelling-up agenda’ (physical, intangible, human, financial, social, and institutional), although none considers natural capital.<sup>24</sup> The absence of environmental justice from the levelling-up agenda could worsen the outcomes that the agenda is seeking to address.

Environmental justice combines an acknowledgement of people’s need for health and wellbeing and social justice with an acknowledgement of their need to connect with the environment. It also considers the consequent benefits upon quality of life. Depending on the criteria chosen for the key metrics, environmental justice is a measurement of ‘fairness’ with regard to people’s opportunity to enjoy environmental benefits. In a wider strategic sense, it helps to ensure the city’s environmental resilience, particularly in a changing climate.

Other cities have developed their own metrics. For example, Berlin is an excellent example of a city that has been pursuing a strong sustainability agenda. Built over a very high water table, providing a specific geographical challenge, it also faced the immense social challenge of German unification. The city’s environmental justice approach involved mapping the environmental risks that it faced, which helped in understanding the inequalities that existed across the

city. Its environmental justice mapping, in place since 2014, has transformed the approach to prioritisation for neighbourhood action, while helping to better inform future growth plans.<sup>25</sup> The current authors considered applying the Berlin approach, but not all the data sets used in Berlin were available for Birmingham.

Other cities around the world have developed their own versions of environmental justice mapping. Richmond in Virginia, USA, for example, was spurred into action through local Black Lives Matter protests. Here, the Mayor initiated a full city audit based upon 39 indicators on climate risks, housing, population demographics, natural resources, built assets and Covid-19 risk, coupled with extensive community consultation. The results highlighted that the five predominantly black neighbourhoods completely lacked access to good-quality green space. Under the Mayor’s direction, local officers identified city-owned land in those five neighbourhoods for conversion to new public parks.<sup>26</sup>

Other UK indicators exist to measure the ‘healthiness’ of a local area. An example is the Access to Healthy Assets and Hazards index,<sup>27</sup> although, despite including some reference to access to green space, it excludes important climate risk assessments.

Sensitivity analysis of the EJI scores in five randomly selected wards has helped in characterising the spatial distribution of environmental justice across Birmingham. Fig. 3 indicates that the greatest environmental injustice was concentrated in certain wards, and across these wards there was a similar level of need. However, in the middle-quintile wards, there were smaller areas to address, suggesting that a more targeted approach is required. Addressing environmental justice, the lower-quartile whiskers of the box plots were often longer than the upper-quartile whiskers.

This approach of using an environmental justice map to identify areas in most need, and implementing a Future Parks Standard, also offers the opportunity for economic analysis whereby a judgement can be made on the cost-effectiveness of alternative interventions. Through the process of data collection, and phased implementation, there is an opportunity for quasi-experimental research to generate robust evidence on the (cost-)effectiveness of interventions.

## Strengths and limitations

One of the main attributes of the EJI is its simplicity in both calculation and presentation, making it easy to understand, both within and outside the local authority, which helps to facilitate policy conversations—and from that perspective it works. However, none of the indicators are weighted, and the benefit of weighting would have meant that indicators such as access to green space, urban heat island impact and flood risk could have been of even more help in differentiating areas in most need of environmental intervention.

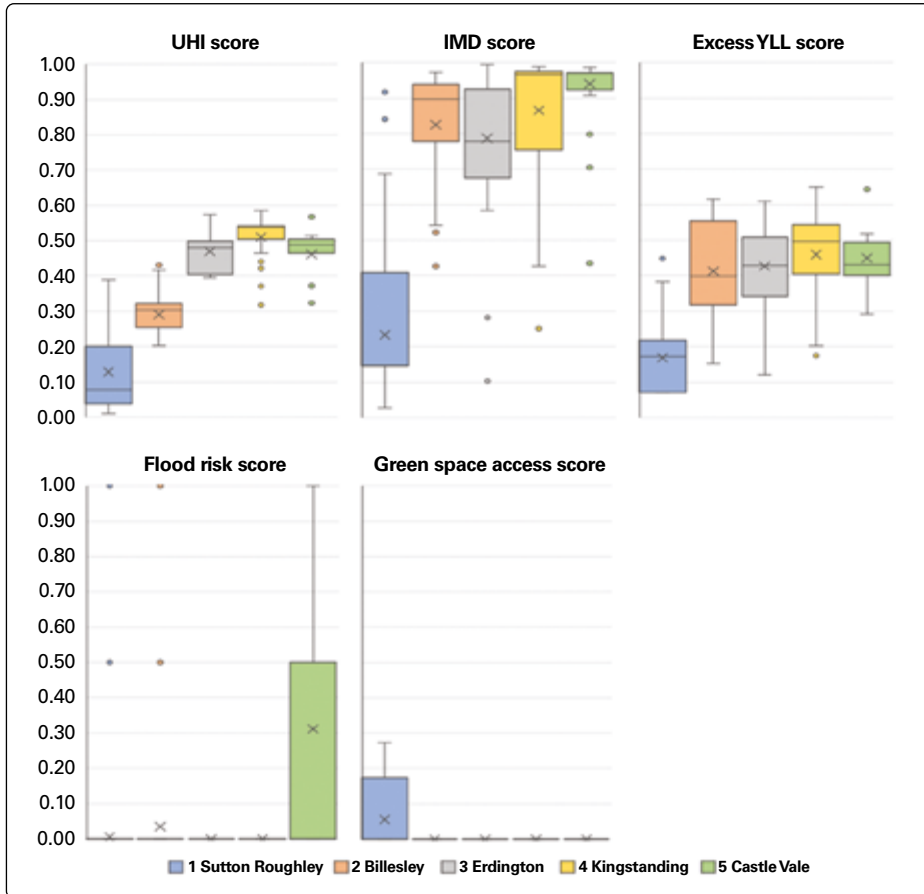
**Table 2**

**Wards selected at random for the EJI spatial distribution analysis**

Quintile	Ward	Mean EJI score	Number of observations
1	Sutton Roughley	0.12	18,507
2	Billesley	0.31	12,276
3	Erdington	0.34	9,635
4	Kingstanding	0.37	8,877
5	Castle Vale	0.43	6,193

Quintile 1: Wards with the lowest EJI score

Quintile 5: Wards with the highest EJI score



**Fig. 3** Box plots showing the distribution of the 20 metre data for underlying layers within five randomly selected wards

However, there is a trade-off here, as implementing a weighting criterion would have complicated the metric. Other limitations are that IMD and excess YLL are linked, and heavily influence the result; and the map uses data from only one point in time. For the future, Birmingham is creating a dynamic map which includes a full climate risk vulnerability assessment.

**Conclusion**

The development of the Environmental Justice Index has helped Birmingham City Council to begin its journey to become a greener city, connecting its

citizens more closely to their environment. Mapping the index to a local level has allowed the council to identify areas of the city most in need of green space intervention and provides a framework for the efficient allocation of scarce resources.

The EJI's simplicity offers an opportunity for other local authorities to take a similar approach, representing a governance challenge to all UK cities and central government on how green space value is measured and monitored. And the approach would bring England in line with environmental justice movements and best practice elsewhere in the world. It also provides a simple mechanism to

join up three current central government policy priorities—levelling up, the climate emergency, and nature recovery. Importantly, it helps to co-ordinate and synergise the resourcing required for delivery on the ground.

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# tackling the nature crisis in the UK

**Peter Jones** looks at some of the recent policy measures and initiatives aimed at tackling the nature crisis



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**Pollution is one of many significant drivers of the global nature crisis**

For many, climate change and the nature crisis are closely linked. Van Griffiths, Deputy Director for Sustainable Business at England's Environment Agency, for example, has argued that the 'two emergencies are inextricably linked, and that we need to play our part in tackling them together—with urgency—as part of the Agency's mission to create better places for people, wildlife and the environment'.<sup>1</sup> However, the Loch Lomond and the Trossachs National Park Authority,<sup>2</sup> an organisation closer to nature than most, has claimed that 'the nature crisis is as crucial as the climate emergency. The two are closely interlinked but the nature crisis is a distinct and crucial challenge in its own right which requires a specific and targeted response.' With this in mind, this article offers a review of some of the recent policy measures and initiatives developed to tackle the nature crisis.

## **Nature—a global crisis**

While there is growing recognition in the UK of the nature crisis, it is very much a global crisis. The Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) reported that 'nature is declining globally at rates unprecedented in human history, and the rate of species extinctions is accelerating with grave impacts on people around the world now likely'.<sup>3</sup> Equally ominously, Sir Robert Watson, Chair of IPBES, has claimed that 'the health of ecosystems on which we and all other species depend is deteriorating more rapidly than ever. We are eroding the very foundations of our economies, livelihoods, food security, health and quality of life worldwide.'<sup>3</sup>

There seems to be a broad consensus on the principal causes of the global nature crisis. A typical assessment has been offered by the United Nations

Environment Programme,<sup>4</sup> which identified the 'five major drivers of biodiversity loss' as 'changes in land and sea use', 'climate change', 'pollution', 'direct exploitation of natural resources', and 'invasive species'. More specifically, it identified the ways that people use the land and the sea as the major drivers of biodiversity loss, including the conversion of forests, wetlands and other natural habitats for agricultural and urban use, and the harvesting of minerals from the ocean floor.

Pollution has a particularly devastating effect on freshwater and marine habitats. Marine plastic pollution has increased dramatically since 1980, and has affected a range of animal species, including marine turtles, seabirds, whales, dolphins, and porpoises. At the same time, plant and insect populations continue to decline because of the commercial use of insecticides.

The WWF's *Living Planet Report 2022*<sup>5</sup> noted that:

*'Nature loss is now rarely perceived as a purely moral or ecological issue, with a broadened sense of its vital importance to our economy, social stability, individual well-being and health, and as a matter of justice. The most vulnerable populations are already the most affected by environmental damage, and we are leaving a terrible legacy to our children and future generations to come.'*

It emphasised that 'we need a global plan for nature, as we have for climate'. In working towards such a plan, the WWF suggested that following the climate model by pursuing net-zero loss for nature was 'certainly not enough', and that what is required is 'a nature- or net-positive goal to restore nature and not simply halt its loss'. The plan would set 'a measurable and time-bound global goal for nature', it would be 'agreed globally and implemented locally', and, arguably more elusively, it would be a plan 'that unites the world in dealing with this existential challenge'.<sup>5</sup>

### **Addressing the UK's nature crisis**

The scale and the extent of the nature crisis in the UK has been clearly spelt out in a variety of arenas. The House of Commons Environmental Audit Committee,<sup>6</sup> for example, described the UK as 'one of the most nature-depleted countries in the world', and reported that '15 percent of UK species are threatened with extinction' and that 'of the G7 countries, the UK has the lowest level of biodiversity remaining'. More specifically, the Environment Agency<sup>7</sup> reported that, over time:

*'Large areas of habitats have been lost, with 99.7% of fens, 97% of species-rich grasslands, 80% of lowland heathlands, up to 70% of ancient woodlands, and up to 85% of saltmarshes destroyed or degraded. The impacts on species have been severe, with a quarter of mammals in*

*England and almost a fifth of UK plants threatened with extinction. A third of British pollinator species have declined.'*

The State of Nature Partnership<sup>8</sup> emphasised that:

*'there has been growing recognition of the value of nature, including its role in tackling climate change, and the need for its conservation among the public and policymakers alike [but] despite progress in ecosystem restoration, conserving species, and moving towards nature-friendly land and sea use, the UK's nature and wider environment continues, overall, to decline and degrade.'*

In a critique of proposed changes to UK Government legislation on the environment, Friends of the Earth<sup>9</sup> argued that 'the destruction of nature is insidiously weakening the life-support systems we need to survive'.

A variety of policy measures and initiatives have been proposed and introduced to tackle the nature crisis within the UK. Measures and initiatives outlined here are drawn from various parts of the UK, and, while some of their constituent elements are focused upon specific problems, the majority look to address a number of general objectives. The aim here is simply to summarise, and provide some illustrative details of, a variety of these measures and initiatives, but not to examine their respective merits, nor to champion one, or more, of them.

In July 2023, the Department for Environment, Food and Rural Affairs announced the launch of six new 'nature recovery' projects across England, led by Natural England and the government with the overall aim of strengthening the existing national Nature Recovery Network and showcasing the delivery of nature recovery at scale. These projects will be supported by £7.4 million of public funding and will cover some 176,000 hectares. The aim is 'to create improved and better-connected habitats for wildlife and improve public access to nature'.<sup>10</sup> The six projects embrace habitat creation in the eastern Eden Valley, in Cumbria; wetlands across Lancashire and Cheshire; nature recovery in the Tees Estuary; restoring, enhancing and connecting heathlands in Surrey; peatland restoration around Bradford and the southern Pennines; and integrated habitat and natural flood management from Seaford to Eastbourne, in Sussex and Kent.

The Lancashire and Cheshire wetlands project, for example, extends over 5,000 hectares, and the aim is to restore and re-wet a mosaic of wetland habitats in southern Greater Manchester and North Cheshire, previously lost to industrialisation, urbanisation, and agricultural intensification. A network of wetlands will be restored to provide habitats for a number of what were once local animal and plant species, including large heath butterflies, bog bush-crickets, white-faced darter



**Habitat creation for curlews is one of the aims of the 'East of Eden' project in Cumbria**

dragonflies, hare's-tail cotton grass, and cross-leaved heath.

The 'East of Eden' project stretches over 100,000 hectares, covering fertile farmland in the Eden Valley, the western slopes of the northern Pennines, and up into the high moorland. Here, the aim is to support land managers in creating habitats for curlew, black grouse, the wart-biter bush-cricket, the twite, and the Teesdale violet, and to introduce natural flood management measures designed to reduce the risk of flooding and improve carbon absorption.

The Scottish Government's Biodiversity Strategy, subtitled *Tackling the Nature Emergency in Scotland*,<sup>11</sup> was published in December 2022. The strategy sets out a framework for the Scottish Government's response to the crisis, and proposes a series of key actions designed to deliver a vision for the restoration of Scotland's natural environment and for supporting wildlife. The framework is to be underpinned by an investment plan that will identify potential funding sources for biodiversity restoration, develop a market for responsible investment in biodiversity restoration, drive efficiency in the use of public funds, and encourage partnership projects.

In focusing on halting biodiversity loss and working towards 'nature-positive' outcomes, the strategy includes a number of priority actions—accelerating restoration and regeneration; expanding Scotland's protected areas to cover at least 30% of the land surface; fostering nature-friendly farming, fishing and forestry; and recovering and protecting vulnerable and important species.

In addressing nature-friendly farming, fishing and forestry, for example, there is a recognition that farming, fisheries, aquaculture and forestry must be managed more sustainably. More specifically, the strategy aims to ensure that measures are put in place 'to ensure that farming practices result in increased uptake of high diversity, nature-rich, high soil carbon, low intensity farming methods, while sustaining high quality food production'.<sup>11</sup> The strategy will also look to ensure that productive forests and woodlands are managed in ways that deliver increased biodiversity and habitat connectivity.

In the wake of the *State of Nature Report, Wales 2019*,<sup>12</sup> which painted a picture of the decline of nature within Wales, WWF Cymru published *Wales's Nature Crisis: Recommendations for an Immediate Emergency Response*.<sup>13</sup> The report centred on four policy themes—ambition, innovation, collaboration, and knowledge—which each included a number of policy recommendations for the Welsh Government. These recommendations cover a range of scales, and WWF Cymru emphasised that they will need to be implemented across government through different mechanisms.

One of the recommendations under the policy theme of ambition, for example, addresses agricultural pollution, and here the argument is that the level of avoidable agricultural pollution is a significant threat to nature. WWF Cymru argues that tackling these pollution problems would deliver huge biodiversity benefits, by supporting the recovery of freshwater ecosystems and fisheries; and more generally that the Welsh Government



should have the ambition to lead a culture in which no avoidable pollution is acceptable. Under the knowledge theme, two policy instruments are highlighted, namely incorporating the ecosystem approach and the relationship between nature recovery and wellbeing within the education system in Wales, and requiring all public officials in Wales to undergo training on the relationship between nature and wellbeing.

The creation and publication of the *People's Plan for Nature*<sup>14</sup> represents a different approach to the nature crisis from those discussed above, in that it is the output from a large-scale public conversation about people's perceptions of nature and its future within the UK. The plan was developed through 'a creative, innovative and inclusive participatory process'<sup>14</sup> that involved two phases. The first phase was an open call, conducted over social media in the autumn of 2022, for ideas and responses from the public, which led to some 30,000 responses drawn from throughout the UK. The second phase centred on the 'People's Assembly for Nature',<sup>14</sup> which involved four weekend sessions, two held in person in Birmingham and two conducted online.

The assembly led to 26 calls to action, embracing vision and leadership; regulation and implementation; nature-friendly farming; food production and consumption; marine protection for coastal waters; waterway and catchment management; local access to nature; and using evidence effectively. In addressing regulation and implementation, for example, the assembly called for 'greater government accountability

through a permanent Assembly for Nature made up of NGOs, industry and public expertise',<sup>14</sup> while one of the calls to action on food production and consumption was for 'a national conversation on how and why we should change our diets to support nature'.<sup>13</sup>

### Concluding reflections

This article has outlined a number of the recent policies and initiatives proposed, and introduced, to tackle the UK's nature crisis. While each has its own distinctive characteristics, some general themes—including partnership and collaboration, the need for increased funding, and sustainable development—appear regularly. All three will surely be vitally important in taking the policies and initiatives forward. However, two wider issues—namely the role that planning might, or might not, play in helping to solve the nature crisis, and the underlying causes of that crisis—merit concluding reflection.

First, nature is often popularly seen as central to the planning system, but the reality is rather different. On the one hand, England's National Planning Policy Framework<sup>15</sup> holds that 'planning policies and decisions should contribute to and enhance the natural and local environment', and many conservation and community organisations have argued that nature should be at the heart of the planning process. On the other hand, much that would be classed as nature lies outside the purview of the planning system—not least in that, while



Mihai Gr on Unsplash



current agricultural management practices are the main drivers of biodiversity change in the UK as a whole, the planning system has limited scope to intervene, with government responsibilities for the management of farmland lying with the Department for Environment, Food and Rural Affairs.

More generally, Hobbs *et al.*,<sup>16</sup> writing under the banner of the Institute for Public Policy Research, argued that the planning system is not set up to support 'the delivery of [...] nature restoration' and that 'housing is generally identified as the key place where the planning system is failing, but this focus on housing alone means that the way the planning system interacts with nature and environment avoids scrutiny'.

Secondly, in addressing the nature crisis, Sir James Bevan, Chief Executive of the Environment Agency, argued that we need to understand 'what's causing it'.<sup>17</sup> In one way, it is difficult to argue with what seems a simple logical approach. A variety of development pressures, including agricultural intensification, continuing urban expansion into the countryside, and the development of forests and wetlands for agricultural, tourism and urban use, are widely cited as being among the causes of the nature crisis, and as such they would seem to hint at specific solutions.

However, there are alternative explanations founded in political economy approaches which might argue that, under capitalism, nature is treated as a commodity in the pursuit of economic growth; and thus it is capitalism that is the fundamental cause of the nature crisis. Put simply, the nature crisis can be seen as a crisis of capitalism. But while some Marxist scholars<sup>18</sup> might suggest that solutions to the nature crisis must be rooted in system change and in confronting capitalism, those currently looking to address the nature crisis within UK policy have little or no empathy with such radical change.

● **Peter Jones** is an Emeritus Professor in the School of Business, Computing and Social Sciences at the University of Gloucestershire. The views expressed are personal.

## Notes

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### Automne

#### The birds

It's autumn and the birds are gathering for the long migration south. Like the so-called 'silver swallows'—retirees who drive their motorhomes down the autoroute into Spain to overwinter in Malaga—the birds are feeling the cold. Soaring in the sky, wings going eighteen to the dozen, one almost ducks when they swoop down over our terrace.

At night they park up, roosting in the plane trees in the main square outside the *Mairie*. Locals know not to park their car there at this time of year for fear they'll get a white 'paint job'.

Readers of this column will know how much I admire the continental approach to the public realm; the streets paved with granite and marble, the fountains filled, flowers in bloom even in searing heat, and sculptures at every corner. The ubiquitous concrete slabs and austerity specification for public spaces by UK local authorities are a world away.

One exception is the overhead catenary in towns and villages. Power and communication cables festoon properties and hang across streets and lanes. The cat's cradle of wires is an eyesore. Undergrounding cables as we do routinely in the UK is not on the work programme except on new developments.

The upshot is that the house martins gathering for their big trip have plenty of Airbnbs on which to perch. We had over 100 lined up on the power cable under our eaves one evening. Until I clapped my hands, that is.

#### Wine to water

Our village *cave co-operative* closed over a decade ago and has stood empty since. It has just been sold. Is this a new wine-making venture, we wonder? No chance.

The range of huge concrete vats, internally rendered with hydraulic mortar, were a beast to clean every few years. It entailed the daunting task of climbing through a small port and then scrubbing the inside with brushes and blasting away with water jets. The vats harbour all manner of cultures that would taint the wine, so nobody in their right

mind is going down that route. So, we thought it was all over; but it isn't yet.

The new owners have installed photovoltaic panels on the roof, turning the building into a powerhouse. And, in a gesture we could describe as 'a unilateral undertaking', they've filled all the vats with water for use by the *sapeurs-pompiers* in the event of a fire in the village. Let's hope it's not needed, but it's good to know it's there.

#### A vintage year?

My friend Olivier has had it with the Portuguese. Having been let down half-way through the 2022 *vendange*, he's now turned east for grape-pickers (such is the benefit of the free movement of workers within the EU). Students from Italy and Poland are now gathering his grapes.

What a nightmare, I think to myself. You spend all year nursing a crop to harvest and then your livelihood is in the hands of strangers who speak a different lingo and who could drop their scissors in a snip. Has anyone done a risk assessment of this business?

All this at the end of a challenging year when temperatures hovered in the mid-40s in August for a full week. You can still see the evidence of that along many of the roads. The lines of plane trees—which apparently allowed Napoleon's troops to march in the shade—dropped their leaves to cope with the high temperatures.

The impacts on vineyards varied, with lots of shrivelled grapes on the younger vines with undeveloped, shallower root systems. Olivier's vines are old and gnarled. Their roots probably go deep down into the magma! He was saved by the unseasonal stormy weather in early September which swelled the fruit. Nevertheless, he dances from foot to foot as he talks to me, and the stress gets to him. It's out of his hands now; all he needs is for his band of brothers to bring in the little beauties and then he can start making the wine, the part of the job he loves most.

#### Allez les bleus!

As I write, the 2023 Rugby World Cup is being held in France. And in the Languedoc we are at the epicentre of the French rugby world. Looking out over the Corbière mountains and the wilds of the *garrigue* we certainly seem a world away from the playing fields of Rugby School.

The Canal du Midi, usually winding down after the summer, is very busy. Motor cruisers ply back and forth, with flags festooned across the cabins—springboks, dragons, silver ferns, saltires, wallabies, even some St George's crosses. Fans are taking

advantage of the gaps between fixtures to explore rural France and maintain their high alcohol levels. There are no breathalysers when you're afloat.

Needless to say, interest among locals is at fever pitch. When France plays there isn't a car on the road, not a person in a shop, nor a couple on the beach. Most towns and cities in the region have 'fan zones' where locals can congregate and watch the action on big screens. With the late and warm summer sun, it's a sociable way of sharing the 'oohs' and 'aahs' with one's tribe.

Not to be outdone, our village has bought a big-screen TV for the *foyer* and opens the bar for the big games. It's proved a hit with the guys, who need little encouragement to gather so they can cheer their lads and jeer at the referee (with some justification, it seems). My concern was that, if France were to lose—as all too soon they did—these same men, who all have shotguns, would take to the hills to vent their frustration on anything that moved. *Allez les bleus*, but wear a *gilet jaune* if you're out walking, just in case.

● **Graeme Bell OBE** is a TCPA Vice-President and lives part of the year in the Languedoc. The views expressed are personal.

## TCPA Webinar

# neighbourhood planning and 20-minute neighbourhoods

**Wednesday 13 December 2023**

**12:00 pm–1:00 pm**

**Webinar, on Zoom**

It is widely assumed that it is the NHS that creates good health, and that a healthy place is one with lots of GP surgeries and hospitals. However, evidence demonstrates that, although the NHS is good at 'mending' people when they become ill, the things that keep people healthy are the places and communities in which they live. In other words, health is made at home and hospitals are for repairs.

Neighbourhood Plans can influence how places develop and seek to ensure that a community has good homes, clean air, jobs, access to parks and green spaces, access to healthy food, and opportunities for connection with friends and neighbours. A focus on health offers an opportunity to create places in which everyone can thrive. To do this well, Neighbourhood Plans need to consider local health evidence, and the 20-minute neighbourhood concept can be used to frame ideas and think about health in a holistic way.

Held in collaboration with Locality, this webinar will explore neighbourhood planning and the role of Locality; how to consider health and wellbeing in Neighbourhood Plans; and the TCPA/University of Manchester Neighbourhood Planning and 20-Minute Neighbourhoods Toolkit.

**For further information and to book a place, see [www.tcpa.org.uk/event/neighbourhood-planning-and-20-minute-neighbourhoods-webinar/](http://www.tcpa.org.uk/event/neighbourhood-planning-and-20-minute-neighbourhoods-webinar/)**

# political prospect with little new year cheer



*'Seven Foods that Make Your Pee Smell (Is This Good or Bad?)'*

*'Three Scary Reasons to Ditch Aluminum Foil (And What to Use Instead)'*

*'Tired, Strained Eyes? Here Are Six Eye Yoga Exercises You Need NOW'*

These are three teaser headlines chosen more or less at random from the hundreds of American online newsletters about health—some of what seems like a tidal wave that pours from the ether onto my computer screen every day. It is at least partly my fault that the past year has wafted quite so many of them to me—because I have been scouring the internet for possible solutions for my voracious Parkinsonia. As a whole, the newsletters reflect an amazing variety of voices—everything from new age hippy to full-on conspiracy theories, to Ocean Robbins, scion of the Baskin-Robbins ice cream franchise, talking about diet.

What holds them all together is a strong belief that to face chronic ill-health you need to look at your diet. This is also seen as the antidote to increasing gaps between pockets of medical knowledge—basically, it means that the treatment is much the same whatever the diagnosis.

Politically, most of them are hard to read, but those that express a preference are clearly Republican. My worry is that this is a burgeoning group of voters who feel sidelined and lied to. It is a dangerous precedent for the US presidential election next year.

Like most Europeans, I look on Trump as a terrifying monster—the latest in a long line of lesser monsters which the American system has foisted on the world. But then you look at their rivals in the Democrats and see a strange looking-glass reflection with similarly authoritarian tendencies.

So what does this have to do with localism in the UK? Well, I look at the USA at the moment and I see all the signs of political and social breakdown that

we in the UK went through in the mid-1970s. And I also fear that all too soon we will be offered the kind of compromise that they look set to have in the USA—between the Trump monster and an 'ancient of days' who seems to be in less than complete control of what his governing machinery has been doing.

The only real difference is that Americans seem to have no compunction at all about murdering each other. Which is really what the environmental lawyer Robert Kennedy Jr has been implying—he is an independent candidate, leading Trump in the latest favourability poll. It was Kennedy who wrote the tome on poor old Anthony Fauci accusing him of knowing about Covid because he was directing US funds to the Wuhan laboratory.

Let me be clear: I don't buy into conspiracy theories, and certainly not the conspiracies that circulate via the US chatrooms. But I do fear that American officials may have clamped down on non-mainstream voices about vaccines. Kennedy claims that, within 36 hours of Biden being sworn in, the social media platforms had been instructed to ban him.

I have no doubt that the people on both sides of the argument in the US believe that they are on the side of the angels, but we are going into a period of huge uncertainty, with two political factions so loathing the opposing side that they can barely address each other, and when professional wisdom is deeply mistrusted, too—whether it comes from surgeons or planners.

In the UK, if the Labour Party wins the next general election, we face the prospect of, on the one side, Suella Braverman-esque types fulminating about foreigners, and, on the other, another deeply conservative left-wing administration which is committed to devolving power but which never dares to let go enough to do anything useful. I expect that, like Biden's administration, the Labour government will be busy monitoring and tracking down its opponents, especially Keir Starmer's hated 'nimbys' objecting to his development plans.

That is not a prospect that fills me with glee for the new year.

● **David Boyle** is the author of *Tickbox* (Little, Brown), *Oppenheimer* (Sharpe) and, with Lesley Yarranton, *Edge City UK* (the Real Press). The views expressed are personal.



# delaying biodiversity net gain — frustrating; and how much will it help?



Requirements for new development to deliver Biodiversity Net Gain (BNG) have been hailed as a world-leading initiative for reversing biodiversity loss. However, these long-awaited regulations have been delayed from November 2023 to January 2024 (April 2024 for small sites) to allow more time for the government, developers and local authorities to get ready.

## The history of BNG

The principle that new development should deliver BNG did not come as a surprise. Since the National Planning Policy Framework (NPPF) was introduced in 2012 there has been a requirement for the planning system to achieve 'net gains for biodiversity,

where possible'.<sup>1</sup> This was strengthened in 2018 and we started to see requirements for 'measurable net gains for biodiversity' to come in.<sup>2</sup> However, the NPPF does not include any indication of what would constitute an appropriate gain.

Clearly, biodiversity is in decline globally and across the UK; the *State of Nature 2023* report found that there has been a decline in average abundance of terrestrial and freshwater species of 19% since 1970.<sup>3</sup> Therefore, it seems sensible that new development should be required to address the problem through gains in habitat creation, restoration and enhancement. To support this, seven years ago CIRIA, CIEEM and IEMA published their principles for delivering BNG.<sup>4</sup>

In 2018, the government consulted on plans to address this issue through setting an expectation that new development should achieve a 10% increase in biodiversity. The purpose of this article is not to set out the detail—that can be found on the Department for Environment, Food and Rural Affairs (Defra) website.<sup>5</sup> The government responded to this consultation in 2019, and the plans were included in the Spring Statement in February of that year: BNG



Photos: Danielle Sinnett

Butterfly meadow in Bristol

was set to be a key component of the Environment Bill, which subsequently passed into legislation as the Environment Act 2021. This provided a two-year transitional period for the industry to prepare before the requirements came into force in November 2023.

Over this time there has been a raft of guidance, case studies, videos, webinars and press articles about the new legislation—including further guidance and case studies from CIRIA, CIEEM and IEMA in 2019.<sup>6</sup> Indeed, searching YouTube reveals that, since Natural England released its video *An Introduction to Biodiversity Net Gain* in 2018,<sup>7</sup> there have been more than 160 videos and webinar recordings covering the forthcoming changes, including general overviews, exemplar projects, the use of the biodiversity metric, and what BNG means for different sectors and specific developments such as infrastructure projects. This information comes from a range of organisations, including professional bodies (for example the RTPI, the Planning Advisory Service (PAS), CIEEM, CIWEM, and the Association for Public Service Excellence—APSE), The Wildlife Trusts, and Homes England, as well as from the private sector (for example White Young Green, WSP, Bidwells, the Land Promoters and Developers Federation, and Willmott Dixon).

And Google searches suggest (see Fig. 1) that people have been trying to find out more: over the past ten years, searches for Biodiversity Net Gain have surged from zero interest running up until around December 2018, up to a peak in September 2023, presumably due to the announced delay.

**Why the delay?**

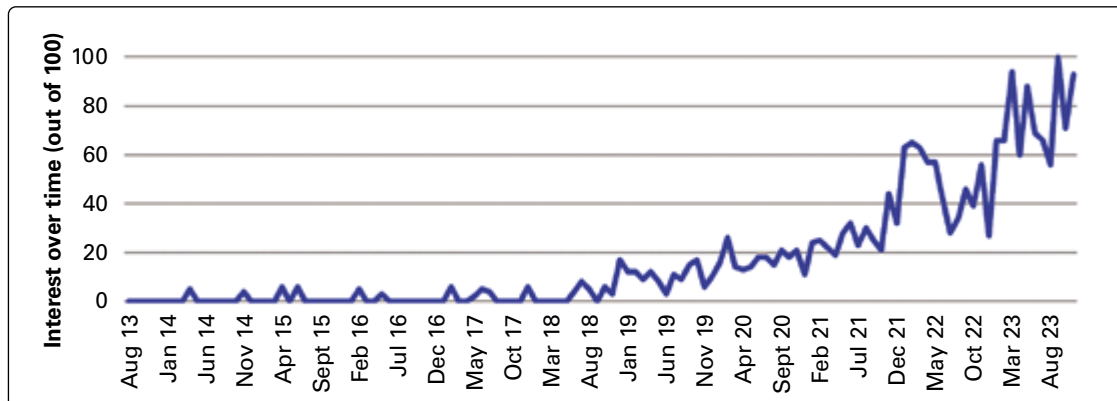
This raft of information has presumably been produced in response to the very real concerns in the sector that BNG represents a significant change

in planning and development. Back in 2019 the RTPI argued in its response to the government consultation that local planning authorities did not have the skills or resources to respond to the BNG requirements, and this year *The Planner* reported that ‘61% of public sector planners could not confirm they would have the dedicated BNG resource and ecological expertise in-house in place by November’.<sup>8</sup> Our own research—for example in examining in the delivery of affordable housing in the South West<sup>9</sup> and on the BiUrbs project<sup>10</sup>—has found that local authorities are still concerned that they do not currently have the necessary expertise or resources.

More worrying perhaps are reports that almost a third of developers are not aware of the changes.<sup>11</sup> In my experience of talking to planners, developers and architects there seems to be patchy knowledge of the scale of the legislation or where the responsibility for implementation lies. For example, there are often assumptions that this is no more than the existing policy requirement in the NPPF (i.e. that a 10% gain is a policy aspiration and not mandatory), or uncertainty about how this fits with the new Green Infrastructure Framework.

As with green infrastructure, maintenance requirements are a huge area of concern, especially given the 30-year requirement. Often it is assumed that local authorities will pick this up, but they are clearly not resourced to do so. Related to this is the need for monitoring over the same period, a requirement which seldom gets mentioned but will call for resourcing and consideration early on—especially, for example, where access may be restricted.

Defra and Natural England have produced a Biodiversity Metric 4.0 to calculate the change in biodiversity, as well as associated guidance and case



**Fig. 1** Google searches for Biodiversity Net Gain from August 2013 to November 2023 measured against a peak value set at 100

Source: Google Trends—<https://trends.google.com/trends>



**Bird and bug boxes at Castle Park, Bristol**

studies.<sup>12</sup> However, it appears that more guidance is expected as a recent press release<sup>13</sup> suggested that templates for biodiversity gain plans, habitat management and monitoring and further guidance on the role and responsibilities of different stakeholders would be produced by the end of November.

### Is a two-month delay going to help?

I am quite sceptical that those who were not ready after a two-year transition will be ready after a further two months—especially as much of this time falls within the Christmas period. When the news of the delay was announced it was reported (and this has been confirmed by people I have spoken to) that much of the sector was quite frustrated about the delay. Yes, they were concerned about resources and, yes, they fully anticipated some teething trouble in getting to grips with a new system; but, set against the costs already incurred in preparing for a November start, the uncertainty created by the delay has been a big hinderance for very little gain.

The delay will, of course, give Natural England and Defra more time to publish their templates and guidance. But while the government has committed to allocating £15million to support for local authorities, at about £47,000 per authority this seems unlikely to address the resourcing concerns that local government has after years of cuts to planning, particularly if recruitment and training of staff is required.

Despite reservations about how much BNG will deliver in real terms, given the scale of biodiversity loss nationally and the relatively small amount of land being developed I am hopeful that this requirement will ensure that new developments are as biodiverse as we know they can be. It is very likely that there will still be those who are not ready, but it is now urgent that we protect and enhance nature in our towns and cities; so we need to get on with it.

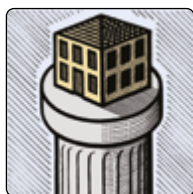
● **Danielle Sinnett** is Professor in Sustainable Built Environments and Director of the Centre for Sustainable Planning and Environments at the University of the West of England, Bristol. The views expressed are personal.

### Notes

- 1 *National Planning Policy Framework*. Department for Communities and Local Government, Mar. 2012. para. 109. [www.gov.uk/government/publications/national-planning-policy-framework--2](http://www.gov.uk/government/publications/national-planning-policy-framework--2)
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# urban design with chinese characteristics



Recently I was invited to join a panel judging the results of an international design competition for a new urban centre in Hangzhou. Travelling to China is always fascinating, but having not been for a few years it was possible to recognise some major changes and new trends since I last visited.

To give some context, Hangzhou is a modern, dynamic city close to Shanghai, with a long history, a population of around 10 million people, a growth rate that has seen it double its population in 20 years, and plans in place to double again. A consequence is that almost everything you see is new (or at least built in the last 20 years), with even historic areas often rebuilt in pseudo-traditional styles.

For most Westerners this represents change on an unimaginable scale; for the Chinese it is simply a necessary investment in their urban future. For example, while we endlessly prevaricate around a single high-speed rail line in England and new underground lines in London take decades to plan (let alone build), in Hangzhou high-speed rail now radiates out in all directions from the city, while its 13 metro lines have all been built since 2012, with

another 12 lines or line extensions planned for delivery in the next five years.

## An austere urbanism

If the scale of the ambition and the delivery is truly mind-blowing, there are downsides. One side-effect of this rapid growth is the critical shortages of housing and its prohibitive cost for many (problems we are all too familiar with in the UK, with a fraction of the growth rate). Given the current slowdown in the Chinese development industry, this may take some time to rectify.

Another downside has been the building of a city in which everyday spaces and living environments can all too often feel austere. Hangzhou is not unique in this as four trends characterise much contemporary Chinese urbanism:

- **First, the inhuman scale of street spaces:**

Despite its truly impressive local and national rail systems, Chinese cities have been planned around the car at a scale that emulates many US cities. A consequence is the interlacing of urban areas with elevated arterials, while, down on the ground level, oversized multi-lane roads turn walking and cycling into a challenging experience. At the same time the acres of tarmac act to further heat often already overheating cities.

- **Second, the inhuman scale of public spaces and buildings:**

Urban squares are not a traditional feature of Chinese cities, which have instead been structured around streets and private courtyards.



Oversized roads carve up many Chinese cities, as in Hangzhou's central business district, while identikit residential towers make up many Hangzhou neighbourhoods





**The inhuman (and deserted) spaces of Hangzhou's second urban centre**

In recent decades Chinese cities have been building new business, civic and retail centres, often accompanied by an over-scaled formality, including overly large new public spaces that are too often uncomfortable to use (given local climatic factors) and lack purpose, and which are therefore under-utilised by residents, who instead flock to the introspective air-conditioned spaces of successive building complexes.

- **Third, the regimented, uniform nature of residential environments:** The speed of construction that Chinese urbanism has supported, and the densities required, have turned large areas of Chinese cities into highly regimented environments in which identical utilitarian towers establish instant neighbourhoods without local differentiation, character, or ground level quality.
- **Fourth, the gating of urban areas:** Traditionally, Chinese cities have featured large areas of gated compounds connected by streets, with a fine-grained network of paths and courtyards inside. As the scale of development has increased, gating has been retained as the norm, initially for reasons of control and more recently as a marketing feature of new neighbourhoods. As a result, getting around has become a fragmented and inconvenient experience for many pedestrians, who need to navigate around large, impermeable urban blocks.

All this has created cities which, at their worst, can be stark, unliveable, and unrelenting, not helped



**Large parts of Hangzhou are gated**

by a system of planning that relies on strict zoning and regulation without the discretion to negotiate better design quality. Thus, while land uses, quantum of development and height controls are strictly enforced, it is largely up to individual developers what they produce within those constraints, with the overriding emphasis for both public and private actors firmly fixed on achieving quantity over quality.

#### **Signs of a more liveable future?**

If all this seems rather bleak, in Hangzhou I saw clear signs of a change, and of a turn towards a more human-centred future for Chinese urbanism, built on a greater focus on place quality.

One very obvious change with a direct impact on the ground level experience of cities is the revolution



The competition brief encouraged the design of human-scaled and distinctly Chinese typologies



Oëli Complex, Hangzhou

that China is seeing in the use of electric cars (far outstripping the West). In Hangzhou and Shanghai my crude assessment was that approaching half of the cars I saw were electric vehicles (easily identifiable by their green number plates). While all cars are carbon emitters and undermine more active modes of travel, the huge benefits of a reduction in local

vehicle pollution was noticeable. This left streets smelling and feeling cleaner, despite being just as heavily trafficked as they were a few years ago.

The design competition that I was asked to judge provided another indicator of a new direction of travel. Design competitions are used regularly in China as a tool of urban design governance, with a





**Vanke Liangzhu Bir Land, Hangzhou**

proven track record of focusing attention on design quality, thereby helping to overcome some of the shortcomings of the planning system. Often these focus on individual buildings and can lead to a 'beauty parade' of more or less extraordinary architectural compositions. Likewise, masterplanning competitions have frequently delivered needlessly formalistic and representational projects. But the latest competition in Hangzhou portended something different.

Hangzhou already has two centres. First, a historical centre on the iconic West Lake and, second, a new central business district, dating from 2007. A third is now proposed as a focus for the burgeoning tech sector in the city (which is home to the tech giant Alibaba). While the second centre is focused on a monumental axis across which sit buildings that represent a sun and a moon (I am not sure why), the brief for the new centre was carefully put together, refined and promoted by one of my former students at UCL in a manner that deliberately attempted to move away from such extravagant gestures. Instead, it emphasised human-scaled spaces and distinctive urban design to reflect its Chinese context.

Although not every submitted scheme took these messages to heart, the most successful schemes clearly did. The results, I hope, pave the way for a very different sort of place to be constructed if and when the project is realised—and perhaps an exemplar for elsewhere.

A final piece of evidence was already apparent on the ground in the form of a minority of recent projects

that have been taking on board the message that the comfort of people should be at the forefront of our considerations. Examples include Renzo Piano's Oōeli Complex, a development of 17 beautifully detailed buildings covering a Hangzhou superblock to define a mixed-use oasis from the surrounding roads and traffic. A second was Vanke Liangzhu Bir Land, a new artistic commercial centre for the Liangzhu Cultural Village. Rather than building an inwardly focused and air-conditioned mall, the developer here attempted to learn from the scale and forms of traditional Chinese commercial streets and create a relaxed focus for this huge new neighbourhood.

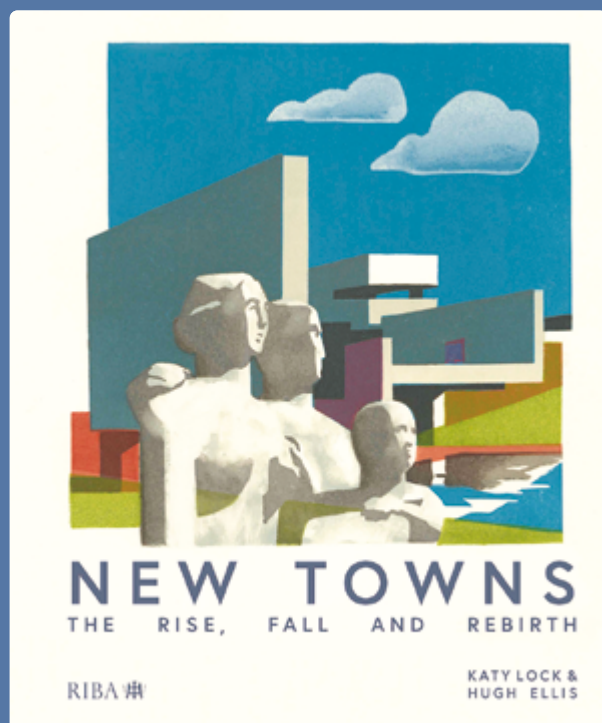
### **Chinese characteristics?**

So what is urban design with Chinese characteristics? Is it the finely grained traditional streets and courtyard houses of the pre-communist China; is it the over-scaled Modernist roads and regimented blocks of more recent times; or is it something new that combines new technologies, connecting public transport infrastructure to rival the best in the world, and a more human, place-based urbanism in which to live, work, and play? The jury is still out, but Hangzhou showed some welcome signs of a more liveable and also sustainable way forward.

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*The views expressed are personal.*

designing new communities for the 21st century

# new towns: the rise, fall and rebirth



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