Fast, smart and beautiful but how green, sustainable and resilient?

Reflections on the environmental and sustainability proposals within the English Planning White Paper

Catalina Turcu* (corresponding author)
Catalina.turcu@ucl.ac.uk

and

Lauren Andres*
l.andres@ucl.ac.uk

* Bartlett School of Planning, University College London, Gower Street, London WC1E 6BT

NB: For publication in *Town & Country Planning Journal*, Jan 2021

Speed, digitalisation and beauty are at the heart of the new English Planning White Paper: *Planning for the future* (WP thereafter). Wider environmental and sustainability targets are, however, less central. There is limited recognition of the impact of the recent COVID-19 pandemic on cities and planning apart from WP's provision for digitalisation and *'modern digital planning services'* that can be accessed from home. Climate change is acknowledged throughout the document, however, with little reference to how to make places not only sustainable but also resilient to future climatic shocks such as flooding, extreme temperature and weather events. Key lessons drawn out of immediate responses to recent and unprecedent changes in cities (including lockdown and social distancing) stress the importance of allowing buildings, open and public spaces, along with parcs and roads to be resilient to sudden environmental, social, economic and institutional change hence, the need for a planning system which accounts for that and is adaptable and flexible enough to respond to future rapid and/or sudden change.

The WP is organised under three pillars which broadly look at how to: simplify and fast-track the plan-making process by, for example, taking a digital-first approach (Pillar 1); refocus on design and sustainability 'quality' (Pillar 2); and make provision for the infrastructure and finance underpinning the planning process (Pillar 3). The provision of (more) housing is THE key reason to 'shake' the planning system and recalls the historical 'mission' of planning in late Victorian and early 20th-century Britain. This earlier planning model was a response to national concerns about the population's poor health and living conditions (see the Booth maps) hence, planning was tasked with a mission to deliver slum clearance programmes and provide decent quality housing. This was generously supported, financially and institutionally, by the government and philanthropists like Peabody and Sutton. This is not the case today: the planning system's call to arms is not about quality but beauty, financing housing development is dictated by property markets, and planning's institutional capacity has been weakened over the last three decades by its 'reform' and the wider devolution agenda in the UK (Tomaney and Ferm, 2018).

The WP suggests that the current planning system is slow, cumbersome and even broken hence, it needs a radical reform in order to be fit for the challenges we face today. Planning seen as 'the bad guy' has been a constant narrative of conservative governments, since Margaret Thatcher. For example, Eric Pickles, local government secretary in the first Cameron government (2010-2015) was holding the belief that planning officials were driven by a *'you can't build anything here'* attitude and planning offices were *'bastions of communism'* (Lord and Tewdwr-Jones, 2014). However, the WP does not offer any detail on why the current planning system is not working well, what is causing the problem and where is the lack of joint thinking, and relies on a series of questions to prompt discussion and consultation, on which to build from the 'bottom' and 'from scratch' as mentioned in its introduction.

Environmental and sustainability aspects are mainly discussed under Pillar 1 and Pillar 2 and can be classified under two broad areas:

- The relevance/ appropriateness of current planning tools and metrics such as EAIs, SAs, SEAs etc, and how these can be simplified, streamlined via better/ more efficient tools (i.e. the new 'sustainability development test') big data and digitalisation (mainly discussed in Pillar 1 but also referred to in Pillar 2)
- Sustainability as a 'test' for design quality/ beauty, and energy-efficiency and Biodiversity Net Gain as a response to the climate change emergency (discussed in Pillar 2)

This paper discusses these two broad areas, in turn. It then moves on to reflect on the missing dimention of resilience in the WP. It concludes by looking at challenges ahead and ways forward.

Planning tools and metrics

The WP proposes to simplify the Environment Assessment Impact (EAI) process; and to abolish Sustainability Appraisals (SA) and Strategic Environmental Assessments (SEAs), to be replaced by a '*consolidated test of "sustainable development", which would include consideration of environmental impact*' (Question 7a). It is assumed that the current *'legal and policy tests for Local Plans'* are too lengthy, lack in transparency and duplicate information (Proposal 16/ 27) and that the use of digitalisation and big data would simplify, streamline and speed-up the planning process.

There is a lot of duplication between EIAs, SAs, and SEAs, and they are all planning decision-making tools, however, they have completely different remits. EIAs specifically focus on individual development impacts on the environment, follow a rigid set of rules regarding data collection (i.e. frequency, seasonal differences, 2y span) and legally flow from European environmental legislation, which may change/ be reframed in a post-Brexit scenario – see reflection at the end of this paper. SAs and SEAs are broader in scope and applied to strategic development/ planning (such as Local Plans or strategic development strategies) and consider wider economic and social effects in addition to potential environmental impacts. By scrapping SAs and SEAs, the strategic dimension of planning remains uncovered hence, the new *'consolidated test of sustainable development'*, whatever that may include, will need to make up for that loss and including, for example, reference to more recent discussions around scales of climate change mitigation and adaptation measures and public health planning.

Simplifying and streamlining the EAI process is a point in case in the WP. This is assumed to be performed via digitalisation and use of Big Data. 'Digital EAIs' can enhance engagement with environmental aspects and/or environmental data collection, however, it is an expensive system to implement (i.e. set up and manage); and, as with any type of digital information, it is not accessible to all. However, the two (EAIs and digitalisation/ big data) can be integrated by bringing together their different functions. While big data collects monitoring data and is effective in gauging response to real impacts on the ground, EAIs model data from a baseline spanning over a two-year period of time. Hence, building big data into the EIA processes could help with making these processes 'speak' to people on the ground by making them more transparent and dynamic, and show real environments effects/ impacts/ outcomes at the local level.

The WP makes a case for an increasing role for matrix/system thinking approaches and big data use. This can be achieved, especially with a view of cutting down unnecessary duplication, surveys and data collection; and avoid formulaic approaches to data collection – for example, there is an array of rigid and ever-expanding regulation for EAI data collection which becomes dated within two years. Yet, the WP does not recognise two things. First, there is already a lot of data collected by planning consultancies and local authorities hence, planning needs to get better at mining and accessing this data and databases; hence, the planning system needs to skill-up as planners are not often trained to analyse and/or 'read' datasets and big data. Second, collecting data and analysing data correctly is expensive and so, investing in 'digitalisation' will be necessary; for example, Pilar 3 which looks at the infrastructure and finance underpinning planning, makes little reference to this.

Design-in sustainability, energy efficiency and biodiversity

'Sustainability talk' looms large in the second pillar of the WP, in relation to designing *'sustainable places'*; and *'combating climate change and maximising environmental benefits'* via *'improvements in the energy efficiency standards for buildings to help deliver our world-leading commitment to net-zero by 2050'* and *'mandatory net gains for biodiversity as a condition of most new development.'*

The WP does not explain what 'sustainable places' may mean and indeed Question16 asks *'what are the priorities for sustainability in local areas'*, giving prompts such as *'less reliance on cars, more green and open spaces; energy efficiency of new buildings and more trees.'* This is problematic for at least two reasons. First, there is little consensus on what 'sustainable' is and so, sustainability is open to a wide range of interpretations in terms of definitions and operationalisation (Turcu, 2013); with planners themselves struggling to attach a meaning to it (Turcu, 2018a). Second, the WP assumes in its very introduction that *'the achievement of sustainable development is an existing and well-understood basis for the planning system'* (p.26). However, it has been argued elsewhere that the NPPF does not provide a clear definition and framework for the delivery of sustainability in planning hence, room for manoeuvre is large; and the current focus on Neighbourhood Planning, which puts communities in the driving seat, can be challenging for the delivery of sustainability in practice, at the wider level (Turcu, 2018b).

This lack of clarity on what sustainability means for English planning has had a number of consequences to date. By comparison to other countries such as Germany and the Netherlands, which are repeatedly referenced throughout the WP, England has failed to deliver developments which have successfully and holistically embedded the three dimensions of sustainability: environmental, economic and social. For example, a

development's environmental and energy targets/standards have been negotiated by developers under development viability appraisals, since 2009, and little thought has been given to both economic and social sustainability. The exception to the rule are two small-scale and experimental developments: BedZED in Sutton (South London), completed almost 20 years ago and mentioned in the WP; and the first phase of the North West Bicester eco-town in Oxfordshire which has been struggling more recently to continue its sustainability vision (Turcu, 2018a).

So, bearing in mind the lack of examples of 'good practice' sustainable schemes in England so far, how could sustainability be 'designed' into the new planning system? We could start by looking at some of our European neighbours: Germany and the Netherlands' have been mentioned before, but also plenty of examples exist in Scandinavian countries such as Sweden, Denmark and Finland. In order to 'operationalise' sustainability (to make sure progress is made) a number of possible avenues can be considered: 1. the new streamlined (and digital) EAI in combination with the mandatory Biodiversity Net Gain (BNG) discussed in detail below; 2. a 'sustainability development test' which can take the format of an existing certification scheme such as BREEAM or LEED, in combination with life cycle analysis; and 3. a 'sustainable design code' or 'sustainable zooning', ideas close to the heart of the WP, with stringent sustainability criteria built-in alongside design/ zoning requirements. Further reflection on how to integrate resilience into the wider sustainability requirements placed on developments should also be considered; this will allow 'places' to bounce back following shocks or crises such as the recent COVID-19 pandemic and should make for a planning system that promotes the design of adaptable and flexible, not only beautiful, places. The WP makes clear provision for each local planning authority to appoint a 'chief officer for design and place-making.' If sustainability is to be taken seriously, the design chief officer will need the skills and/or training to be able to do so.

Energy-efficiency and net-zero are key approaches in tackling the climate change crisis, and the WP is primarily focussing on buildings i.e. *'net zero homes'* and *'energy efficiency standards for buildings.'* However, planning is more than 'buildings' and instrumental in supporting de-carbonisation of transport and other urban systems (waste, food, heat, electricity, water etc). For example, principles set up in the WP should lay the foundations to facilitate transition to low-carbon transportation by: prioritising access to sustainable transportation/ public transport; where cars are allowed, provision should be made for transition to low carbon/ electric cars (i.e. provision of charging points); incentivising the use of pool cars etc. Moreover, energy-efficiency ambitions should be further developed along at least three lines: 1. energy standards need to be tightened up and made more stringent; 2. planning should carbon count for whole cycle of building/ development (i.e. life cycle analysis) (Turcu, 2017) – for example, LCA can be a requirement in the Future Homes Standard; and 3. local authorities should be put in charge of the Future Home Standard in order to be able to negotiate and set carbon requirements.

Finally, the WP flags-up the impeding introduction of a mandatory Biodiversity Net Gain (BNG) target. The Environmental Bill currently with the Parliament seeks to impose a 10% BNG (i.e. 10% improvement in biodiversity value) on all new developments. Introducing BNG in planning is an immense opportunity but comes with a number of caveats. First, the way BNG is implemented needs a clear set of rules on how to apply the 10% gain; for example, achieving BNG by protecting and enhancing wetlands/ forest which is part of a development is different from achieving BNG within a development built on greenfield or in the city. Biodiversity enhancement can vary widely from providing green roofs, through

sustainable urban drainage and treed streets, to natural reserves adjacent to a development. The Green Area Factor Standards used in Germany and Sweden could be a good example to follow here. Second, BNG needs to be 'real' on the ground and so, investing in monitoring is needed; also, why not being even more ambitious and aim for Environmental Net Gain as part of a re-framed EIA process? Third, big data is not useful for understanding the ever-changing nature of eco-systems; for example, a brownfield site now may not have biodiversity value, but it will have in 10 years' time.

Sustainability is also resilience

The WP makes no reference to how planning, in general, and development, in particular, can be made more resilient. This is especially important in the light of recent events such as the COVID-19 pandemic but also climate change related natural disasters, which show us that the planning and design of places need to allow for flexibility, rapid transformation and adaptable spaces, to be able to 'bounce back' in the eventuality of future crisis/ shocks to the system. Planning should be fit to allow for adaptability and flexibility in an anticipatory way, and sustainability cannot be delivered without resilience and vice-versa.

Resilience 'thinking' is often introduced as a post-event strategy; this has been the case in English planning for designing safer places, following on from the rise in terrorist attacks since 2001 (Coaffee and O'Hare, 2008). The COVID-19 pandemic has revealed how unprepared we are and raised questions relevant to planning about how cities have been/ are developed in relation to movement restrictions such as lockdown and social distancing; how we work, socialise, travel etc; and our relation to density. The implication of this goes beyond the digitalisation of the planning system, which makes it easier for people to work from home among others, into how we plan for healthy lives in healthy cities within a more health-inclusive, pro-active and flexible planning system (Rydin et al., 2012).

Moreover, lockdown and social distancing have shifted individual behaviours, which in turn have impacted on mobility patterns and have resulted in various forms of 'temporary urbanism' (Andres and Zhang, 2021, Madanipour, 2017) such as temporary transformations and re-arrangements of spaces (Law et al., 2020; Deas et al., 2020). As such, it seems to be agreement across academics and practitioners that flexibility in design and planning of cities is crucial to ensure their resiliency (Crump, 2020); this includes an ability to respond to unprecedent public health emergencies by converting buildings into hospitals, as well as making spaces 'safe' for everyday use. For example, most public spaces and street furniture have been adapted/ changed to allow for social distancing (e.g. wider pavements and footpaths), maintain economic activities (e.g. restaurant spreading their outdoor dining on pavements) and accommodate new individual mobilities (temporary cycling lanes, one-way circulations in parcs, etc).

All of this needs to be included in a planning system which is fit for the challenges we face today and hence, play a part in the planning Green Paper. Careful consideration and guidance should be given here on how/ when/ whether to 'relax' planning regulation to allow for flexibility and adaptability.

Challenges ahead and ways forward

At least three overarching challenges lay ahead for 'getting right' environmental and sustainability goals in the forthcoming Green Paper along with allowing a more adaptable and responsive hence, more resilient planning system: available resources (human, financial, time etc); legal and regulatory frameworks; and cross-border thinking.

Austerity measures resulting in public expenditure cuts together with wider changes in the political landscape have challenged the effectiveness and capacity of the English planning system to deliver sustainable development, with many previous efforts being cut short in the last 10 years (Rydin & Turcu, 2014, 2019). Substantial reductions in local authority budgets have seen 'sustainability' capacity reduced or eliminated (Turcu, 2018b). This reform requires more (or different) planning capacity not less, and the comprehensive resources and skills strategy for the planning sector mentioned in the WP will need to unpack that; it is not only about 'planners on job' but also about the type of education and training they receive. Research shows that in an under-resourced planning system most urgent action is prioritised (Andres et al., 2020) which may affect quality of design and sustainability aspects. Moreover, ensuing post-pandemic impacts on the economy are here to stay hence, an extension of the previous austerity climate can be expected. This means that even more planning 'work' may be deployed onto private consultancies and developers and so, economic viability and recovery concerns may prevail sustainability concerns and a wider public interest. Moreover, the WP implies radical change including new tools and new thinking. Before making the new and better planning system work, a first period of transition is due. That implies adjustments (of procedures, people, skills etc) and subsequent delays which will need acknowledgement and investment.

Brexit has a direct impact on the environmental and sustainability dimension of planning. Some areas of current EU policy do have a big impact on shaping national planning policy and the spatial distribution of people, industry and commerce. The EU has a series of goals including the promotion of economic, and social cohesion, conservation of natural resources and cultural heritage, which help to achieve a more sustainable Europe. As such, much of the UK's environmental legislation is transported from EU directives. One example is the requirement for EAIs. It is still unclear what EU-level regulation and legislation may translate into national context during the transitional period and in post-Brexit era; this includes various amendments to air quality, transport, energy and water legislation, all areas of relevance to planning. In addition, a more resilient planning system will entail a certain flexibility of planning regulations. This can be accounted for via new regulations (cf. MHCLG, 2020) to deliver more flexible/ adaptable places (Andres, 2013) and possibly planning frameworks which are less prescriptive in terms of land-use and factor in change over time. A word of caution here: previous relaxation of planning regulation on permitted development have been criticised as creating 'slums of the future' (Ferm, J. et al., 2020).

Environmental and sustainability outcomes require whole system thinking and are cross-border issues. With the abolition of Duty to Cooperate proposed in the WP, that will be problematic to achieve. The Duty to Cooperate fills a gap, that of lacking a regional and strategic tier in English planning. Hence, there needs to be compensation for that loss if we were to have meaningful environmental and sustainability targets in planning. Will the new 'sustainability test' be such replacement, or the re-activation of city-regions with their own regional planning and spatial strategies, following the example set by London?

REFERENCES

Andres, L & Zhang, Y (ed), 2021, Transforming Cities Through Temporary Urbanism - A Comparative Overview, Springer, London.

Andres, L., 2013, Differential spaces, power-hierarchy and collaborative planning: a critique of the role of temporary users in shaping and making places, Urban Studies, 50(4), pp. 759-77.

Andres, L., Bryson, J., Denoon-StevenS, S., BakarE, H., Du Toit, K., Melgaco, L., 2020, Calling for Responsible Inclusive Planning and Healthy Cities in Africa, Town Planning Review, https://doi.org/10.3828/tpr.2020.49

Coaffee, J. and O'Hare, P., 2008, Urban resilience and national security: the role for planners, Proceeding of the Institute of Civil Engineers: Urban Design and Planning, 161, Issue DP4, 171-182.

Crump, L., 2020, Meanwhile uses in the city – should this be the new normal? https://blogs.lse.ac.uk/progressingplanning/2020/07/06/meanwhile-uses-in-the-city-should-this-be-the-new-normal/

Deas, I., Martin M., Hincks, S., 2020, Temporary urban uses in response to COVID-19: bolstering resilience via short-term experimental solutions, Town Planning Review, https://doi.org/10.3828/tpr.2020.45

Ferm, J., Clifford, B., Canelas, P., Livingstone, N., 2020, Emerging problematics of deregulating the urban: The case of permitted development in England, Urban Studies, http://dx.doi.org/10.1177/0042098020936966

Karadimitriou N, Gabrieli T, Turcu C (2016) Measuring the social, economic and environmental effects of property and infrastructure development, London: RICS.

Law, L., Azzali, S., Conejos, S. 2020, Planning for the temporary: temporary urbanism and public space in a time of COVID-19, Town Planning Review, https://doi.org/10.3828/tpr.2020.48

Lord, A. & Tewdwr-Jones, M., 2014, Is Planning "Under Attack"? Chronicling the Deregulation of Urban and Environmental Planning in England, European Planning Studies, 22:2, 345-361

Madanipour A., 2017. Cities in Time: Temporary urbanism and the future of the city. London: Bloomsbury.

MHCLG (Ministry of Housing, Communities and Local Government), 2020, 'Government to grant permission for pubs and restaurants to operate as takeaways as part of coronavirus response', press release, 17 March 2020, https://www.gov.uk/government/news/government-to-grant-permission-for-pubs-and-restaurants-to-operate-as-takeaways- as-part-of-coronavirus-response (accessed 10 May 2020).

Rydin Y., Bleahu, A., Davies M., Dávila J.D., Friel, S., De Grandis G., Groce, N., Hallal, P.C., Hamilton I., Howden-Chapman P., Lai K-M., Lim CJ., Martins J., Osrin D., Ridley I., Scott I., Taylor M., Wilkinson P. & Wilson J., 2012, Shaping cities for health: complexity and the planning of urban environments in the 21st century, The Lancet; 379: 9831: 2079–2108

Rydin, Y., & Turcu, C**.** (2014). Key Trends in Policy for Low-Energy Built Environments: a 20-year Review. *Local Environment: the international journal of justice and sustainability*. doi:10.1080/13549839.2013.810837

Rydin, Y., & Turcu, C**.** (2019). Revisiting urban energy initiatives in the UK: declining local capacity in a shifting policy context. Energy Policy. 129. P. 653-660

Tomaney J, Ferm J. (2018), Planning Practice Critical Perspectives from the UK, Routledge, London

Turcu, C. (2013). Re-thinking sustainability indicators: local perspectives of urban sustainability. Journal of Environmental Planning and Management, 56(5), 695-719. doi:10.1080/09640568.2012.698984
Turcu, C. (2018a). Responsibility for sustainable development in Europe: What does it mean for planning theory and practice? Planning Theory & Practice, 19(3), 385-404.
Turcu, C. (2018b). Sustainable Development and Plannning. In J. Ferm & J. Tomaney (Eds.), Planning Practice: Critical Perspectives from the UK: Routledge.