

a green planning system?

Richard Simmons sets out ten tests to assess whether planning reform delivered in the wake of the Planning White Paper results in a system that truly puts climate and biodiversity front and centre



Richard Simmons

Hammarby Sjöstad in inner-city Stockholm – a genuine attempt to build greener and better

Right now, officials are compiling the government's response to myriad representations on its Planning White Paper.¹ It was worryingly sketchy for a policy proposal aimed at ripping up the post-war planning system in England and replacing it with one 'fit for the 21st century'. They must be praying for bright ideas to put flesh on its bones. Ministers want workable 'reforms' marrying libertarian deregulation to the

Building Better, Building Beautiful Commission's less than obviously compatible aspirations for great design.

The government is intent on rolling back the 'nationalisation' of development rights ushered in by the 1947 Town and Country Planning Act. Building homes for sale is to be a primary purpose of planning. Developers will have automatic outline

planning permission in 'Growth Areas'. All while Ministers wish up beautiful, tree-lined places. The White Paper says it also wants planning to 'address the challenges of climate change' and 'improve biodiversity'.

Meanwhile, in the preparations for November's COP26 climate summit in Glasgow, the Prime Minister has announced the government's Ten Point Plan for a Green Industrial Revolution,² published a green Energy White Paper,³ and signed the Leaders' Pledge for Nature and stated his intention to protect more land for biodiversity.⁴

This is all welcome but, in what might almost be a parallel universe, the government aims to reduce our grip on levers that might enable us to plan to tackle our climate and biodiversity problems by deregulating planning, including proposals to extend permitted development rights,⁵ and talking up deregulatory measures such as freeports to 'level up' England and drive post-Brexit growth.

Regulation is not always the best way to deal with a problem, but market failure has got the climate and nature to the bad places they are in today, so asking the market to fix things is not the answer. In its heart of hearts, the government must surely know this, because the White Paper rightly links the twin spectres of climate crisis and biodiversity collapse to planning. What we build, where we build it and how we move around it are major drivers of greenhouse gas emissions. Habitat degradation and destruction are frequent consequences of development. A 21st century planning system should be green, taking the climate and biodiversity emergencies as its starting point.

Does the White Paper do this? And, importantly, is it well aligned with the government's more recent pronouncements ahead of COP26? No. It lacks ambition – for example pushing zero-carbon homes back to 2050, compared with the original target of 2016; it is ambiguous about environmental measures; and it has too many objectives, with no clear sense that priority needs to go to tackling global heating and mass extinctions.

When final proposals emerge from Whitehall, how would we know if the system had morphed into one that puts climate and biodiversity front and centre? I propose three propositions for a green planning system and ten tests of whether we have one.

Three propositions and ten tests

A green planning system must:

- Focus on the roles of the built environment and transport as big generators of greenhouse gases that are deeply damaging to the climate system and biodiversity, and act urgently to change that.
- Plan to mitigate and adapt to global heating as a priority.
- Value natural capital's capacity to sustain ecosystems, including our own.

The following ten tests can be applied to determine whether we have a green planning system:

- **Is there strategic focus on efficient use of land, buildings and natural resources?** The White Paper says nothing about strategic planning. If anything, it resiles from what little we have. It should consider land uses and their impact on resource efficiency and biodiversity at larger-than-local scale – for example through a national land use strategy, by always putting brownfield development first, and by creating meaningful wildlife corridors.

'A 21st century planning system should be green, taking the climate and biodiversity emergencies as its starting point'

- **Are citizens empowered to act on the environment?** The White Paper offers people scope to influence Local Plans and design codes but appears to reduce their potential to engage on individual schemes. The automatic grant of outline consent, and the focus on rules-based decision-making, using machine reading technology, leaves the scope of community involvement at project level obscure. Yet well informed citizens make good decisions, especially about the environment – see the Climate Assembly UK report, *The Path to Net Zero*.⁶ Green planning would invest in active citizenship, empowering people throughout the development process. Deliberative democracy by citizens' forums is one good way to do this locally.
- **Are infrastructure and land use planning holistic?** The White Paper suggests placing major housing developments into the national infrastructure planning regime, alongside transport and energy. Yet large schemes have locality just as much as small ones. Separating land use and infrastructure planning increases the risk of getting things wrong because the focus would be on big projects when greener local solutions often work better. Green planning would fully integrate land use and infrastructure planning under local scrutiny.
- **Is natural capital valued?** The White Paper sees the countryside only as a place where special landscapes need protection. In fact, it is a valuable asset. Rural green infrastructure is a powerful tool for climate mitigation and adaptation and for restoring degraded ecosystems. Countryside respected for its true worth as natural capital would not just be protected: its value would be enhanced.

● **Are regulatory systems complementary?**

Building control, which sets construction standards, is not mentioned in the White Paper. But planning and building control need to work towards common goals, like a more ambitious target date for zero-carbon homes and better ways to handle the impacts of extreme weather.

● **Are environmental assessments robust?** The government proposes simplifying environmental assessment. In fact, complexity is not the problem. It is how well assessments identify the risks that development brings to the climate, ecosystems and biodiversity, and whether anyone acts on them. They must be as complex as necessary to enable this.

● **Do nature and sustainable design come first?** Nature, because sustaining and restoring the natural environment is key to reversing species decline and one of our best hopes for surviving the climate emergency. Sustainable design, because we have to turn back the tide of greenhouse gas pollution.

● **Are land use and transport planned together?** Land use drives transport demand. Remote housing estates without public transport create car journeys. Denser places support buses, metros, and trams. The White Paper does not seem to acknowledge this interconnectedness. Meanwhile, the Department for Transport is busy writing its own carbon reduction strategy,⁷ seemingly without reference to what planning deregulation may throw up or how changes in land use patterns can impact demand. A green planning system would unite the two and prioritise low-carbon choices.

● **Does the system mandate targets for greenhouse gas reduction and biodiversity improvement?** Fine words are all very well, but as former Bank of England Governor Mark Carney pointed out in his 2020 Reith Lectures: 'Since what gets measured gets managed, every major company should disclose how climate affects its current business and how it could affect their strategies.'⁸ If this is true of relatively unaccountable businesses, how much more true must it be for a publicly accountable planning system? Any self-respecting green system would measure its impact on the twin emergencies, with regular reporting on stretching targets.

● **Does the system promote environmental justice?** Global heating and habitat loss impact the poor harder than the rich. Fuel poverty goes hand in hand with inadequate home insulation. Planning, White Paper style, would result in building mostly homes for sale and would risk reductions in social housing construction. That would be unjust for those who end up in sub-standard accommodation in environmentally degraded areas. Green planning seeks justice for all.

Will the government deliver a green planning system? We are promised radical reform, but it seems to be radical only in changing the means. The ends – 300,000 new homes per annum, mostly for sale – don't seem to be up for grabs. Of course we need affordable new homes in the right places; but they should be put there by a locally accountable planning system, designed first and foremost to reverse the environmental damage that is heating our climate and eroding our wildlife habitats, the productivity of our farms and forests, and the natural capital that sustains our lives.

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Notes

- 1 *Planning for the Future*. White Paper. Ministry of Housing, Communities and Local Government, Aug. 2020. www.gov.uk/government/consultations/planning-for-the-future
- 2 *The Ten Point Plan for a Green Industrial Revolution*. HM Government, Nov. 2020. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/936567/10_POINT_PLAN_BOOKLET.pdf
- 3 *Powering Our Net Zero Future*. Energy White Paper. CP 337. HM Government, Dec. 2020. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945899/201216_BEIS_EWP_Command_Paper_Accessible.pdf
- 4 'PM commits to protect 30% of UK land in boost for biodiversity'. Press Release. Prime Minister's Office and Department for Environment, Food and Rural Affairs, 28 Sept. 2020. www.gov.uk/government/news/pm-commits-to-protect-30-of-uk-land-in-boost-for-biodiversity
- 5 *Supporting Housing Delivery and Public Service Infrastructure*. Consultation Paper. Ministry of Housing, Communities and Local Government, Dec. 2020. www.gov.uk/government/consultations/supporting-housing-delivery-and-public-service-infrastructure/supporting-housing-delivery-and-public-service-infrastructure
- 6 *The Path to Net Zero*. Final Report. Climate Assembly UK, Sept. 2020. www.climateassembly.uk/report/
- 7 *Decarbonising Transport: Setting the Challenge*. Department for Transport, Mar. 2020. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/932122/decarbonising-transport-setting-the-challenge.pdf
- 8 M Carney: 'Lecture 4: From climate crisis to real prosperity'. *How We Get What We Value*. Reith Lectures 2020. BBC Radio 4, Dec. 2020. https://downloads.bbc.co.uk/radio4/reith2020/Reith_2020_Lecture_4_transcript.pdf