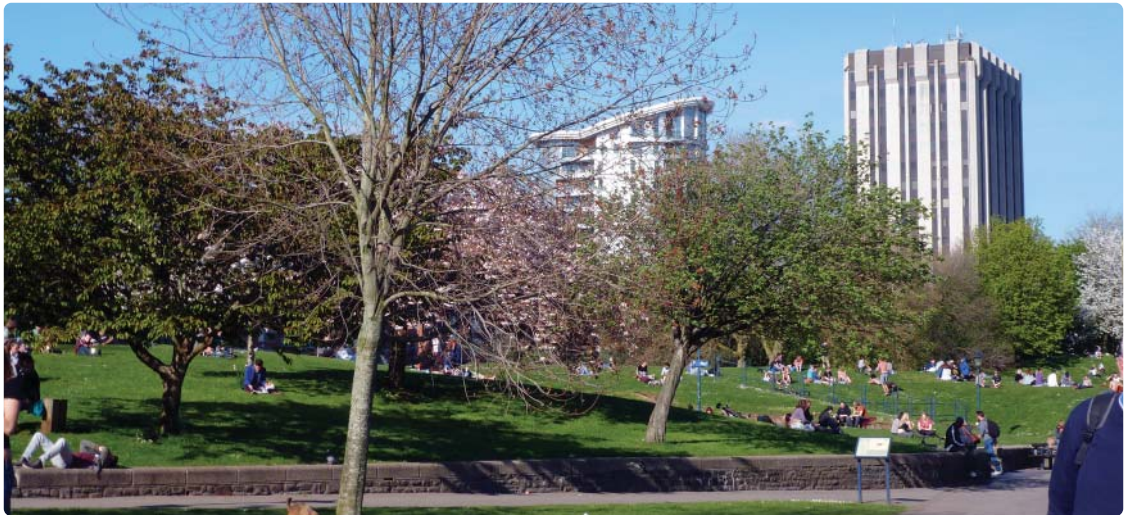


planning policy relaxation's threat to GI



Danielle Sinnett

Bristol's Castle Park—high-quality green infrastructure is essential but often challenging to deliver

Following the attempt to relax planning policy requirements under the 'Investment Zones' proposal, there is renewed concern for the quality of new development and environmental protection. Although the policy is under review, with a view to being 'refocused', and there have been reassurances that any new zones would not undermine the environment, key national and local policies could nevertheless be relaxed and 'essential infrastructure' prioritised. Obviously, I would argue that green infrastructure is essential, but we know that it is often challenging to deliver. Just as access to green space and the quality of places seemed to be given greater priority through design codes, the focus is once again on relaxing requirements.

Is green infrastructure essential infrastructure?

One of the reasons I like the term 'green infrastructure' is that it positions green spaces, street trees and all the other green and blue

features as essential features within our villages, towns, and cities. Indeed, the *Oxford English Dictionary* defines infrastructure as 'the basic physical and organizational structures and facilities (e.g. buildings, roads, and power supplies) needed for the operation of a society or enterprise'. So, green infrastructure is needed for the operation of society. This aligns with the National Planning Policy Framework (NPPF),¹ which refers to public space and green infrastructure as a key component of the 'healthy, inclusive and safe places' that are the aim of planning policy and decision-making.

The importance of public space and green infrastructure in delivering healthy sustainable places was recognised in the first version of the NPPF issued in 2012. Since then, NPPF policies have been strengthened in terms of the quality of new development and the role of design codes, with the latest version setting a requirement for tree-lined streets. In 2021, we saw the introduction

Table 1
Open space and Accessible Natural Greenspace Standards (ANGST)

Open space standards	Accessible Natural Greenspace Standards (ANGST)
<ul style="list-style-type: none"> ● More than 15 dwellings: Local area of play (LAP) within 100 metres ● More than 200 dwellings: Local equipped area of play (LEAP) within 400 metres ● More than 500 dwellings: Neighbourhood equipped area of play (NEAP) within 1,000 metres 	<ul style="list-style-type: none"> ● Doorstep green space: More than 0.5 hectares within 200 metres ● Local green space: More than 2 hectares within 300 metres (straight line) or 500 metres (actual walking/cycling route) ● Neighbourhood: 10 hectares within 1 kilometre ● Wider neighbourhood: 20 hectares within 2 kilometres ● District: 100 hectares within 5 kilometres ● Sub-regional: 500 hectares within 10 kilometres ● Local Nature Reserves (LNRs): LNRs of at least 1 hectare per 1,000 population

of the National Model Design Code, which sets expectations on the quality of new development, again reiterating the relationship between design, health and wellbeing, and the creation of safe and inclusive places. It is intended to operationalise some of the requirements in the NPPF, providing more specific requirements on green infrastructure in the absence of local design codes, including the importance of tree-lined streets—but it also sets out what these local codes are expected to cover, including the design of streets, public and play spaces, green infrastructure, and sustainable drainage systems, as well as the use of open space and green space standards (see, for example, Table 1).

So, we have an NPPF and National Model Design Code that set out the importance of green infrastructure, including access to green space and tree-lined streets. But we know that these are often hard to deliver in new developments, and are among the aspects of policy seen as a ‘burden’ imposed by planning policy, often being scaled back post-consent (if they were ever included in the first place).^{2,3} I would therefore argue that any relaxation of planning is likely to make the provision of green infrastructure more fragile.

Can we learn anything from office-to-residential conversions?

A relatively recent effort to deliver new homes via a relaxation of planning can be examined to explore this: changes of use from office to residential under permitted development rights (PDR). This policy, in place since 2013, has already been reported to be

detrimental to the quality of homes. In 2018 Clifford *et al.*⁴ found that many of these schemes result in poor-quality homes, with inadequate internal space, natural light, access to amenity, and play space. Since then, there have been some changes to provide natural light and adhere to space standards. In 2021 further changes were introduced, limiting the size of offices that can be converted to residential use, but also expanding the permission to include Use Class E retail-to-residential conversion.

By looking at these conversions, but focusing on the standards required for open space, green space, and tree-lined streets, we can get some idea of what happens when these requirements are relaxed. To do so, I looked at all the prior approvals for a change of use from office use to at least 10 residential units in the four local authorities in the West of England (the City of Bristol, South Gloucestershire, Bath and North East Somerset, and North Somerset) from 2013 to October 2022. This is an area of high house prices and a significant demand for housing, including from students and young professionals, while it also has areas of relatively high levels of deprivation.

Some disappointing although perhaps unsurprising patterns emerged from the study. I found prior approvals since the change of use policy came into force relating to 50 properties on the planning portals for the four local authorities. They ranged from two in South Gloucestershire to 34 in Bristol, of between 10 and 366 units.

If all these changes went ahead they would provide 1,665 units for the West of England, of which 1,187

are in Bristol, at an average of around 35 units per approval. This would make a substantial contribution to the of 3,801 homes per year requirement for new housing set out in local policy. All 50 developments are for flats, often one-bedroom or studio flats, and only two appeared, from aerial imagery, to have access to any form of private outdoor space. Knowing some of these addresses, some of these conversions have focused on the student or short-term rental market.

Looking first at the LAP and LEAP open space standards (see Table 1), of these 50 developments only 11 have a green space within 100 metres (aligning with the LAP requirements, although I did not explore whether play equipment is provided). However, 47 have a green space within 400 metres (aligning with LEAP requirements), but most of these were either across a main road or river and/or were less than 1 hectare in size. Around 35 were in predominately commercial locations, often in the city centres of Bristol or Bath, so there is unlikely to be good access to play or sports equipment within the green spaces. Eleven are in what appear to be business parks, six of which are in out-of-town locations next to main roads or motorways.

Consideration against the Accessible Natural Greenspace Standards (ANGST—see Table 1) illustrates the importance of examining the size of green space as well as proximity. Whereas only 11 sites met the LAP open space standard of having a green space within 100 metres from home, 31 of the sites have access to ‘doorstep green space’ within 200 metres from home. However, when we look at the standard of ‘local green space’ within 300 metres only 21 sites met this criterion—26 lower than those meeting the LEAP standard. The main reason for this is the size of the green space; only four developments have a green space within 400 metres but not 300 metres—for the remaining 22 the green space is smaller than 2 hectares.

As with open space standards, many of those meeting ANGST have green space within 200–300 metres—but at a straight-line distance which would involve crossing a main road or river so the green space is not truly accessible. Three sites would have met the criteria for a local green space based on proximity to a cemetery, plus a further site due to proximity to allotments—again it is unlikely that these spaces will provide the same benefits for outdoor activity as a park or play space.

Of the 50 developments explored, only eight are located on a tree-lined street. Most of these are also located on a main road or next to a railway, and so do not provide an attractive walking environment. A further three developments have a tree-lined

street on one side, but not the others, and another eight have trees on an adjacent site; so these at least provide some views of trees.

What this very quick analysis suggests is that office-to-residential conversions do not provide the access to the green infrastructure essential for good health and wellbeing, because the level of control offered by prior approval rather than planning permission is much more limited. This is particularly worrying given that many of these developments are also located close to main roads or in out-of-town business parks, and so provide little access to other amenities and have no private outdoor space. Those living in these conversions are presumably from more deprived groups or students—both of which have relatively high prevalence of poor mental health and are likely to benefit the most from better access to green space.

If the government is serious about providing high-quality developments, it must recognise green infrastructure as essential infrastructure and protect it from any relaxation of planning policy—be it in Investment Zones or whatever the latest attempt to deliver more homes becomes.

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Notes

- 1 *National Planning Policy Framework*. Ministry of Housing, Communities and Local Government, Jul. 2021. www.gov.uk/government/publications/national-planning-policy-framework--2
- 2 H Hickman, N Croft, H Foroughmand Araabi, K McClymont and A Sheppard: *The Whittling Away of Wonderful Ideas: Post-Consent and the Diminution of Design Quality*. University of the West of England, for West of England Combined Authority, Apr. 2021. <https://uwe-repository.worktribe.com/output/7318606>
- 3 T Calvert, D Sinnett, N Smith, G Jerome, S Burgess and L King: ‘Setting the standard for green infrastructure: the need for, and features of, a benchmark in England’. *Planning Practice & Research*, published online: 15 Oct. 2018. Available at <https://uwe-repository.worktribe.com/output/855163/setting-the-standard-for-green-infrastructure-the-need-for-and-features-of-a-benchmark-in-england>
- 4 B Clifford, J Ferm, N Livingstone and P Canelas: *Assessing the Impacts of Extending Permitted Development Rights to Office-to-Residential Change of Use in England*. RICS, May 2018. www.rics.org/globalassets/rics-website/media/knowledge/research/research-reports/assessing-the-impacts-of-extending-permitted-development-rights-to-office-to-residential-change-of-use-in-england-rics.pdf