

DISSERTATION

by Grace Hewett

Submission date: 02-Sep-2019 07:36AM (UTC+0100)

Submission ID: 110429163

File name: 63869_Grace_Hewett_DISSERTATION_1064851_1981051890.pdf (2.26M)

Word count: 17391

Character count: 103821

UNIVERSITY COLLEGE LONDON
FACULTY OF THE BUILT ENVIRONMENT
BARTLETT SCHOOL OF PLANNING

**Development Viability Assessments and Public Participation:
Restoring a Balance of Power on the Greenwich Peninsula**

GRACE HEWETT

Being a dissertation submitted to the faculty of The Built Environment as part of the requirements for the award of the MSc Spatial Planning at University College London:
I declare that this dissertation is entirely my own work and that ideas, data and images, as well as direct quotations, drawn from elsewhere are identified and referenced.

Signature:

Date: 02/09/2019

Main Body Word Count: 10,311
Appendices Word Count: 4,908

Acknowledgements:

I would like to thank the interviewees for generously offering their time to discuss their experiences with financial viability appraisals on the Greenwich Peninsula development. Without their insight, this research would not have been possible. I would also like to thank Dr Enora Robin for her supportive feedback and encouragement. Finally, I would like to thank Croydon Council for the opportunity to undertake a placement in Development Management, where I have gained an experiential understanding of the use of development viability appraisals in decision-making.

Contents:

| | |
|--|-----------|
| Abstract: | 4 |
| List of Tables, Figures and Abbreviations: | 5 |
| 1. Introduction: | 6 |
| 2. Literature Review: | 8 |
| 2.1 - The Planning System | |
| 2.2 - Viability Appraisal | |
| 2.3 - Urban Governance and the Politics of Expertise | |
| 2.4 - Public Participation | |
| 3. Research Methodology: | 14 |
| 3.1 - Research Question and Objectives | |
| 3.2 - Methodology | |
| 3.3 - Interview Recruitment and Methodology | |
| 3.4 - Document Review Methodology | |
| 3.5 - Research Limitations | |
| 3.6 - Statement of Research Ethics | |
| 4. Case Study: The Greenwich Peninsula: | 19 |
| 4.1 - Background | |
| 4.2 - Deed of Variation | |
| 4.3 - 2015 Masterplan | |
| 5. Findings and Analysis: | 24 |
| 5.1 - Urban Governance and Expertise | |
| 5.2 - Stakeholder Involvement and Influence | |
| 5.3 - Disclosure and Public Participation | |
| 6. Conclusions: | 36 |
| 6.1 - Summarisation of Research and Conclusions | |
| 6.2 - Future Research | |
| 7. Reference List: | 39 |
| 8. Appendix: | 47 |
| 8.1 - Consent Form | |
| 8.2 - Interview Questions | |
| 8.3 - Document Review | |
| 8.4 - Risk Assessment | |

Abstract:

Viability appraisals have become deeply embedded in the UK planning system. This is reflective of an incremental shift in urban governance; compartmentalising planning into deliverable tasks that privilege technical expertise, calculative instruments and quantitative forms of knowledge. However, the complexity of viability appraisals has marginalised stakeholders without the requisite expertise to interpret and scrutinise technical calculations. Furthermore, access to viability appraisals has been restricted by confidentiality clauses that prevent public disclosure. Combined with the assumed rationality of calculative modelling and expert input, viability appraisals have largely gone unquestioned. Thus, the institutionalisation of viability appraisals has resulted in an imbalance of stakeholder power; producing urban space in accordance with short-term economic objectives and narrow definitions of what is deliverable, whilst excluding communities and neglecting to address local needs and aspirations. Nonetheless, a recent emendation to the National Planning Policy Framework advocates the public disclosure of viability appraisals. This offers a compelling opportunity to ensure greater transparency; facilitating public participation and achieving more equitable development outcomes. Therefore, drawing upon the regeneration of the Greenwich Peninsula (London), this dissertation focuses on the roles of stakeholders involved in viability modelling and related decision-making; seeking to address how transparency can widen stakeholder involvement and aid the inclusion of non-technical expertise in viability modelling and related decision-making. This research draws upon a document review of submitted planning documents and supporting evidence, as well as semi-structured interviews with a range of stakeholders involved in producing and interpreting viability appraisals. The dissertation concludes that public disclosure and heightened transparency of viability appraisals can widen stakeholder involvement; enabling more effective participation and equitable decision-making. However, this is dependent on destabilising the current emphasis given to technical expertise and quantitative forms of knowledge.

List of Tables and Figures:

| Tables: | Title: | Page: |
|---------|--|-------|
| Table 1 | <i>List of Respondents</i> | 16 |
| Table 2 | <i>Documentation reviewed from planning application: 15/0716/O</i> | 17 |
| Table 3 | <i>Documentation for Deed of Variation to S106 agreement</i> | 17 |
| Table 4 | <i>Modelling Process for Site-Specific Development Viability Appraisal</i> | 26 |
| Table 5 | <i>Review Process of Site-Specific Development Viability Appraisal</i> | 27 |
| Table 6 | <i>Deed of Variation: References to Viability and Consultation</i> | 52 |
| Table 7 | <i>15/0716/O: References to Viability and Consultation</i> | 54 |

| Figures: | Title: | Page: |
|----------|--|-------|
| Figure 1 | <i>Aerial photograph of Greenwich Peninsula prior to regeneration</i> | 19 |
| Figure 2 | <i>Timeline of the planning process for the Greenwich Peninsula development</i> | 22 |
| Figure 3 | <i>Network of experts, documents and stakeholders involved in pursuing planning permission for the regeneration of the Greenwich Peninsula</i> | 24 |

Abbreviations:

| | |
|------|------------------------------------|
| DVA | Development Viability Appraisal |
| GLA | Greater London Authority |
| LPA | Local Planning Authority |
| NPPF | National Planning Policy Framework |
| RBG | Royal Borough of Greenwich |
| S106 | Section 106 Agreement |
| SCE | Statement of Community Engagement |

1.0 Introduction

In the United Kingdom, financial viability modelling has become increasingly embedded within the planning system. Viability appraisals are utilised both when formulating area-wide policies and to determine the deliverability of site-specific development. Through providing a viability appraisal, developers can negotiate a reduction in the level of planning obligations, which are used to secure social infrastructure such as affordable housing. However, a lack of authoritative guidance and input sensitivity has enabled systemic bias, which is sympathetic to the needs of developers, often occurring at the expense of local communities. Consequently, in London, there has been a reduction in the delivery of affordable housing (Sayce, et al., 2017), which is contributing to a 'crisis' of housing affordability (Bowie, 2010; Edwards, 2016); problematising the assumption that increasing land values will incentivise the release of land for policy-compliant development and highlighting a tension between local needs and global flows of capital.

Due to the complexity of viability appraisals, expert knowledge is required to conduct the calculative modelling; problematising the scrutiny of calculations and resulting in a reliance on 'sector-led' expertise (Lock, 2016). This institutionalisation of viability thus privileges technical expertise and is restructuring processes of urban governance, with greater autonomy given to expert consultants. This is highly problematic and, coupled with a lack of governance, has allowed consultants to define both the modelling process and stakeholder consultation. This has resulted in selective participation, which has marginalised non-technical knowledge and created an asymmetrical distribution of stakeholder power that limits public participation. Consequently, the local communities affected by decision-making are frequently silenced. Therefore, it is important to assess the stakeholders involved in DVA modelling to ensure that existing methods for capturing planning obligations are effective. Accordingly, the politics of technical expertise is central to this dissertation.

The marginalisation of local communities is further problematised by a lack of transparency, with confidentiality clauses enabling DVAs to be redacted and thus unscrutinised. This creates a further barrier to public participation and has resulted in distrust from local communities who are unable to access and interpret DVAs (HCLGC, 2018). However, a recent emendation to the NPPF advocates that 'all viability assessments [...] should be made publicly available.' (MHCLG, 2019: p.16). Additionally, this is encouraged at a local scale in supplementary planning guidance published by the

GLA (2017). This policy innovation offers a compelling opportunity for transparency; rebalancing stakeholder power and enabling more effective public participation. Therefore, this dissertation aims to explore how the disclosure of unreacted DVAs can enable both the inclusion of non-technical expertise in viability modelling and effective public participation in related reviews and decision-making. The following sections are structured as follows: Section 2 explores the existing literature; connecting contemporary debates concerning both viability and public participation and providing the theoretical framework underpinning the research and analysis. Section 3 outlines the research questions, objectives and methodology. Section 4 introduces the case study and Section 5 offers an analysis of the research findings; situating DVAs within processes of urban governance, identifying stakeholder involvement and recognising opportunities for greater public participation. Finally, Section 6 concludes by arguing that public disclosure and greater transparency can widen stakeholder involvement; leading to more effective public participation and equitable decision-making.

2.0 Literature Review

2.1 The Planning System

The UK has a plan-led system that strategically promotes long-term and sustainable development through adopted local plans, which development proposals are required to comply with (DCLG, 2012). However, the planning system is discretionary and decisions regarding site-specific development are determined individually; offering an element of negotiation and an opportunity to address the needs of *all* stakeholders (Hart, 2015). Albrechts (2004) argues that democracy, transparency and accountability are fundamental to ensuring the planning system delivers equitable outcomes. Similarly, Healey (1996) aligns the purpose of planning towards the collective interest; mediating conflicting stakeholder interests through inclusive and democratic participation. The importance of multi-stakeholder consultation is institutionalised in the Aarhus Convention (UNECE, 1998), which provides the right to assess environmental information and supports public participation in decision-making. This gives formal agency to communities and further emphasises the importance of transparency. Therefore, the purpose of the planning system can be understood as the transparent and democratic coordination of conflicting stakeholder interests to ensure that the production of urban space is equitable.

'Planning obligations' offer an instrument to ensure that development addresses local need; mitigating negative externalities through conditioning private developers to provide social and physical infrastructure, notably affordable housing (Hart, 2015). Additionally, they provide an instrument to redistribute the increase in value that occurs through the interaction of land markets and the planning system when planning permission is granted, which Barker (2004) argues is the consequence of both public and private actions. However, Christophers (2014) argues that planning obligations have undergone an incremental transition from a mitigative function to an instrument for facilitating the market-led provision of affordable housing. This is reflective of the broader contemporary politico-economic context of neoliberalism and a shift from 'urban managerialism' to 'urban entrepreneurialism' (see Harvey, 1989), in which economic liberality is given to markets, with LPAs expected to secure public assets through public-private partnerships. Nonetheless, this market-supply is problematic as it does not necessarily deliver development in areas where it is most required (Booth, 2012). This is further problematised by the recent emphasis given to viability appraisals, which quantitatively assess whether planning obligations would compromise 'competitive returns to a willing

landowner and a willing developer' (DCLG, 2012 p.41); 'normalising' profitability as a fundamental consideration (Christophers, 2014). Accordingly, McAllister et al (2016) argue that viability appraisals have been opportunistically utilised to acquire a reduction in the required planning obligations. Therefore, viability appraisals must be both transparent and democratic to ensure that development is equitable and addresses local need.

2.2 Viability Appraisals

Due to the complexity, there exists an array of literature exploring both site-specific and area-wide DVAs. The simplified model used to calculate viability is:

$$\text{Residual Land Value} = \text{Predicted Development Revenues} - \text{Development Costs}$$

Development is considered viable if the residual land value is sufficient to incentivise the release of land, whilst also covering financial returns to the developer and development costs, including planning obligations (McAllister, 2017). However, McAllister et al (2013b) astutely highlight that determining viability based on the residual land value is problematic as there is no standardised benchmark to release the land, which thus results in opportunistic expectations and unequal distribution. This lack of standardisation is discussed by McAllister (2017) who provides a comprehensive timeline of the policy innovation concerning viability, noting an evolution defined by 'morphogenesis'; developing in an extemporaneous manner without necessary governance, which has been 'constructive from the perspective of landowners and destructive from the perspective of the wider community' (p129)¹. Furthermore, due to input uncertainty and sensitivity, this morphogenic guidance has facilitated systemic bias, motivated by strong economic incentives that encourage consultants to deliberately underestimate revenue or overestimate development costs (Colenutt et al, 2015; McAllister et al, 2016). This absence of standardisation is demonstrative of neoliberal government ideology, which believes that planning should facilitate, rather than regulate, economic growth (McAllister, 2017). Therefore, as viability appraisals determine the degree to which communities benefit, it is important to establish the stakeholders participating in DVA modelling, as well as their respective responsibilities and motivations.

McAllister et al (2013a) argue that an institutional trust in calculative modelling legitimises DVAs; allowing calculations to be unquestioned and preventing scrutiny from other stakeholders. However, the aforementioned systemic bias problematises this façade of technocracy and rationality, and it is thus important to identify the limitations of DVAs.

¹ For the evolution of viability modelling see Christophers (2014).

McAllister et al (2016) argue that the complexity of DVAs maintains the existing imbalance of stakeholder power; marginalising stakeholders who do not possess the technical expertise to scrutinise appraisals. Consequently, LPAs and local communities are often confronted with calculations central to decision-making, without the requisite knowledge to reach an informed decision (McAllister et al, 2015). Furthermore, this complexity is allowing the 'black-boxing' of information, in which stakeholder involvement is restricted and expert, technocratic assumptions are accepted without external scrutiny (Rydin, 2012). This is facilitated by confidentiality clauses, which significantly reduce transparency and restrict access to calculations, thus creating tension with the need for public participation. Importantly, Colenutt et al (2015) argue that transparency is necessary to conduct a sensitivity analysis and identify the range of viabilities. However, Colenutt et al neglect to consider how communities, who often lack 'technical' expertise, could conduct such an analysis. Moreover, whilst Critchley (2015) argues that full disclosure would penalise the developers that exceed market expectations, transparency is paramount to ensuring democratic and equitable decision-making. Therefore, increased transparency and access to DVAs is necessary to unlock the black box and allow lay participation in modelling processes.

The modelling and interpretation of DVAs is thus conducted by expert consultants and is significantly 'sector-led' (Lock, 2016). Accompanied with limited governance, this is giving autonomy to consultants to define and manage modelling processes (McAllister et al, 2013a), which has resulted in selective stakeholder consultation that marginalises actors whose expertise is considered invalid (McAllister et al, 2016). Moreover, Christophers (2014) astutely highlights that this liberality has enabled DVA modelling to transition from an epistemological instrument to an ontological function, with models becoming 'performative'; mobilising the production of urban space in accordance with market definitions of what is 'viable' and thus structuring the urban landscape in relation to profit margins and economic metrics. This privileges the short-term financial objectives of developers and narrows what is deliverable, whilst compromising the integral objective of long-term 'sustainable development' that addresses local needs (Colenutt et al, 2015). Therefore, this reinforces that equitable development outcomes require greater stakeholder participation in DVA modelling. However, the complexity of DVA modelling also problematises lay participation, presenting a barrier to critical interpretation.

Existing literature highlights the imbalance of stakeholder participation; however, there is a lack of literature that brings together research on viability and public participation. The most significant contribution to this debate is offered by McAllister et al

(2013a) who offer an insight into the stakeholders influencing DVA, as well as those who are excluded; confirming selective consultation, which is resulting in the marginalisation of non-technical expertise and inequitable outcomes that maintain spatial inequalities.

McAllister et al evidence unequal opportunities to participate in DVA consultation, resulting in an absence of community input. Interestingly, McAllister et al evidence that greater transparency and stakeholder participation ameliorates the robustness of DVA modelling through reducing the opportunity for systemic bias. Nonetheless, this research is limited as it was considered only in relation to the use of DVA for area-wide policy formation.

Therefore, there is an urgent demand for further empirical research on both selective stakeholder participation and the potential of public disclosure for public participation in DVA modelling and related decision-making. It is this gap in the existing literature that this dissertation seeks to address.

2.3 Politics of Expertise and Urban Governance

The sector-led reliance caused by the technical complexity of DVAs is illustrative of the wider compartmentalisation of planning, with urban governance and decision-making fractured into 'deliverable' projects (Robin 2018). Raco et al (2016) argue that urban development is managed by a multiplicity of expert consultants and facilitated by 'anti-democratic development machines' (p,216), defined as delivery-focused models that manage and mould local needs. DVAs can be understood as an important component of these machines. Raco et al state that the complexity of urban governance creates a further layer of opacity, which problematises accountability as it becomes difficult to identify which expert is responsible, especially on large-scale urban regeneration schemes. Moreover, they highlight that community engagement has become the responsibility of experts who, recruited by the developer, seek to depoliticise participation through neutralising opposition; translating local needs into deliverable aspirations, whilst masquerading this process in the rhetoric of inclusivity and empowerment. Therefore, effective public participation, unrestricted by definitions of profitability and viability, is dependent on the destabilisation of these 'development machines'. Furthermore, opportunities for stakeholder consultation must recognise the inherently political nature of both decision-making and viability modelling. However, Raco et al's (2016) text is limited as it neglects to demonstrate how this destabilisation could occur.

Similarly, Robin (2018) argues that the institutionalisation of technical modelling mobilises the economic objectives of private developers and structures urban space accordingly which, in global cities like London, is resulting in a tension between global

flows of capital and the needs of local communities. Like Christophers (2014), Robin acknowledges that the 'performativity' of 'development machines' is structuring urban space in accordance with the logic of developers and defines the expertise considered legitimate; however, whilst she acknowledges the existence of alternative community-led development proposals, there is no suggestion of how non-technical expertise and experiential and qualitative forms of knowledge could be integrated into decision-making. Furthermore, the combination of the depoliticisation of public participation discussed by Raco et al (2016) and the marginalisation of non-technical expertise discussed by Robin (2018) is resulting in what Vogelpohl (2018) argues is the '(de-)democratisation' of decision-making which, steered by experts fulfilling economic objectives, is weakening the ability of planning system to ensure equitable development. Accordingly, McAllister et al (2013a) argue that an awareness of the performativity of calculative instruments and the material consequences of decision-making is required to ensure equitable development outcomes. McAllister et al suggest that this can be achieved through recognising the experiential knowledge possessed by local communities who encounter the tangible outcomes of decision-making. Therefore, it is important to consider how non-technical expertise can be included in decision-making to ensure the (re-)democratisation of participation and decision-making to achieve more equitable outcomes.

2.4 Public Participation

The notion of 'communicative planning' has long been debated in planning literature concerning public participation, with Healey (1996) identifying a 'communicative turn' that theorised democratisation and the legitimisation of experiential and local forms of knowledge. Similarly, Forester (1989) encourages communicative 'social processes' with equal stakeholder participation and Hillier (2000) advocates the negation of dominant power relations through recognition of informal social networks that exist outside of established planning processes. Whilst this literature no longer responds to contemporary planning processes, it highlights the importance of wider stakeholder influence to ensure that the planning system achieves democratic, transparent and equitable decision-making. Elling (2017) offers a contemporary remobilisation of communicative planning; highlighting the potential of non-technical expertise and presenting public participation as a mechanism to destabilise existing governance structures. Elling illustrates the importance of local expertise in achieving strategic and long-term objectives and resisting the hegemonic short-term, economic interests of developers. Elling thus understands communicative planning as a 'counter-power'; extending what is considered legitimate 'knowledge' to

restore equilibrium between technical and local expertise and democratising decision-making. Therefore, communicative dialogue between *all* stakeholders offers a mechanism to democratise decision-making and facilitate the emergence of radical and equitable alternatives that would not otherwise be possible within existing structures of urban governance.

Similarly, Curry (2012) recognises the importance of 'local expertise', which he argues can complement technical expertise. However, Curry also identifies a polarity that creates tension between technical expertise and 'lay knowledge', which has resulted in an institutionalised 'knowledge-based tension' (p.14). Curry argues that this polarity must be destabilised to allow the integration of different perspectives in decision-making, which is necessary to recognise the complexity of social issues and resolve social inequalities. However, Sheppard et al, (2015) argue that effective public participation is dependent on transparency and the disclosure of information, with unequal access maintaining hegemonic power structures. Interestingly, Sheppard et al equate transparency with trust, stating that this will legitimise decision-making. However, this is problematic as the technocratic rationality of DVAs serves a legitimising function (Colenutt et al, 2015) and thus transparency may only further legitimise financially motivated decisions. Accordingly, transparency must be accompanied with opportunities for public actors to interpret, scrutinise and effectively contribute to decision-making. Moreover, Sheppard et al argue that full disclosure is not necessary, claiming that interpreting the 'gist' of technical information is sufficient. However, this claim is limited as it is not supported with empirical evidence. Moreover, it is often the 'sensitive' inputs that require scrutiny and thus partial disclosure may limit a sensitivity analysis of viable alternatives. Furthermore, both authors neglect to discuss the challenges of technical complexity for lay participants, as well as the heterogeneity of communities, with many lacking the expertise, resources and social mobility required to access disclosed information and communicate their findings (see Albrechts, 2004). Therefore, whilst transparency is paramount, the NPPF policy innovation advocating disclosure is hollow without accompanying opportunities and mechanisms for public participation. It is thus the aim of this dissertation to address how public disclosure can be supported to enable effective public participation.

3.0 Research Methodology

3.1 Research Question and Objectives

As demonstrated in the literature review, existing research evidences a reliance on technical expertise and an imbalance of stakeholder influence on DVAs. This dissertation seeks to understand how the public disclosure of DVAs can aid community actors in participating in DVA modelling and related decision-making. The focus is on DVAs for site-specific development.

Research Question:

How does the recent revision to the NPPF, which advocates the public disclosure of development viability appraisals, aid public participation in decision-making and contribute to achieving equitable development outcomes?

Objectives:

1. To identify the stakeholders consulted and their respective responsibilities in processes of DVA modelling and related decision-making.
2. To understand how the public disclosure of DVAs can enable greater stakeholder involvement and allow the inclusion of non-technical expertise in DVA modelling and related decision-making.
3. To determine the extent to which the recent NPPF policy innovation advocating public disclosure will widen stakeholder involvement in decision-making and contribute to achieving equitable development outcomes that address local need.

3.2 Methodology

The research questions explore processes of viability modelling and public participation; identifying existing barriers and exploring the experiential perspectives of stakeholders. Accordingly, a qualitative enquiry is most suitable. This research adopts the form of an 'instrumental' case study (Stake, 2005), focusing on the redevelopment of the Greenwich Peninsula. This case is appropriate as it demonstrates the particularities of contemporary urban governance, the opacity of DVA modelling and the complexity of public participation. Whilst the development is expansive and composed of multiple proposals, it is important to distinguish the methodology from a collective case study (see Stake, 2005) as the research is not comparative or demonstrative of multiple perspectives. Instead, it seeks to develop an in-depth insight into the complexities and contexts of this particular case. This is achieved by combining the case study with interviews and a document review. Furthermore, the national and regional policy context of the case allows for 'within-system' generalisation' (Steinberg, 2015); in which the findings can theoretically transcend the case to consider the disclosure of DVAs and public participation within the UK planning system.

3.3 Interview Recruitment and Methodology

Given the assemblage of both public and private actors involved in contemporary structures of urban governance, it was important to interview a range of stakeholders involved in the development of the Greenwich Peninsula. In total, 20 key stakeholders involved in the planning process were invited to participate. Stakeholders were identified from the documentation submitted as part of the planning applications. These included the developer, a range of private consultants, local community groups, planning officers and councillors. A total of ten contacts responded, with three declining the invitation citing a lack of time and two responding after the analysis had been conducted. This level of response was expected due to the contentiousness of the subject.

A total of five interviews were conducted between 18th July - 2nd August in locations across the case study site, each lasting between 25 - 40 minutes. One interview was conducted over the telephone. Written consent was collected for all interviews and participants were informed of the use of their data (see Appendix 8.1). An information sheet outlining the research was circulated prior to the interviews and the objectives were repeated at the start of each interview. Topic guides were prepared, consisting of semi-structured questions arranged thematically; according to the politics of expertise and urban governance, imbalances of stakeholder power and public disclosure (see Appendix 8.2).

The flexibility of semi-structured questions allowed the conversation to digress, often expanding on the stakeholder's experiences. Separate questions were prepared for consultants, community groups, planning officers and councillors. Following the interviews, all recordings were transcribed and remarkable statements were coded according to the research themes.

| Anonymised Reference: | Interview Date: | Expertise of interviewees: |
|-----------------------|-----------------|---|
| LPA 1 | 02/08/2019 | Experienced planning officer in development management. |
| CG 1 | 22/07/2019 | Residents association, including experienced researcher specialising in affordable housing. |
| CR 1 | 22/07/2019 | Councillor, specialising in public participation concerning regeneration. |
| C 1 | 18/07/2019 | Experienced viability consultant, advising local authorities on S106 agreements. |
| CG 2 | 22/07/2019 | Residents association. |

Table 1 - List of Respondents

3.4 Document Review Methodology

The document review focuses on two stages during the redevelopment. The first focuses on supporting evidence informing a deed of variation to the S106 agreement, as well as decision notices from a related First-tier Tribunal concerning public disclosure of the DVA. The second focuses on documents submitted for the planning application concerning the Greenwich Peninsula Masterplan. All documentation was publicly available. Documents were coded according to the aforementioned research themes, with significant statements highlighted and excerpted [see Appendix 8.3]. This was used to inform the tables and diagrams.

| Document | Author |
|--|--------------------------------|
| Development Viability Appraisal | BNP Paribas |
| Planning Board - Officer Report | RBG |
| Statement of Community Engagement [pre-application] | Nathaniel Lichfield & Partners |
| Planning Addendum: Consultation Responses [statutory consultation] | Nathaniel Lichfield & Partners |
| Planning Report D&P/0519Q/01 | GLA |
| Planning Report D&P/0519Q/02 | GLA |
| Independent Review of Financial Viability Appraisal | Christopher Marsh & Co. Ltd. |
| Planning Statement | Nathaniel Lichfield & Partners |
| Design and Access Statement | Allies and Morrison Architects |

Table 2 - Documentation reviewed from planning application: 15/0716/O

| Document | Author |
|---|---|
| Planning Board - Officer Report | RBG |
| Planning Board - Minutes | RBG |
| Independent Review of Financial Viability Appraisal | Christopher Marsh & Co. Ltd. |
| Freedom of Information Decision Notice | Information Commissioner's Office (ICO) |
| First-tier Tribunal Decision Notice | ICO |

Table 3 - Documentation for Deed of Variation to S106 agreement

3.5 Research Limitations

The evaluation draws on the research collected. The nature of an 'instrumental' case study means that generalisation is required to apply the research findings. However, (Holman et al, 2017) evidence a tension between national policies and local authority interpretation, which allows a degree of variation. Moreover, the openness of the NPPF guidance on viability allows nuanced interpretations and, therefore, generalisation may be restricted.

3.6 Statement of Research Ethics

The nature of viability appraisals is ideologically controversial. Thus, as McAllister (2017) notes, maintaining objectivity requires a conscious effort. This contentiousness also presents a potentially sensitive topic for the stakeholders approached and, as Stake (2005) highlights, case study research draws upon the personal and experiential understanding of stakeholders. Accordingly, all stakeholders were informed of their option to withdraw and are anonymised throughout this dissertation.

4.0 Case Study: The Greenwich Peninsula

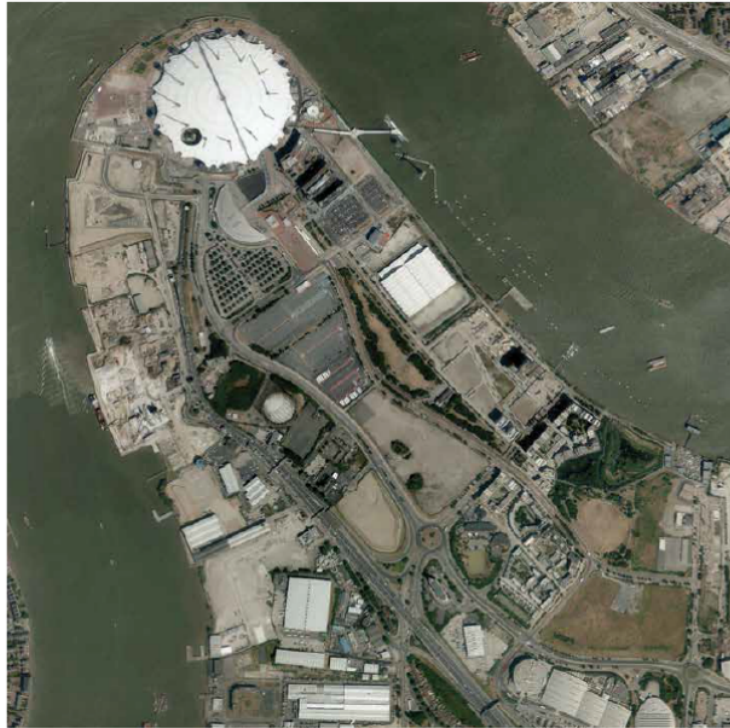


Figure 1 - Ariel photograph of Greenwich Peninsula prior to regeneration. Source: Allies and Morrison

4.1 Background

The redevelopment of the Greenwich Peninsula provides an interesting case to analyse stakeholder participation in DVA modelling and related decision-making, in the context of large-scale urban regeneration. The Greenwich Peninsula is a 170hectare district, located in the east of London and bordered on three sides by the River Thames. The peninsula is characterised by varied land uses; with small and fragmented residential areas, the Millennium Dome entertainment arena, a range of shops, and is divided by an arterial road that connects the site to the North of the river. Historically, the Greenwich Peninsula served an industrial purpose; dominated by large gasworks and a power station. Following deindustrialisation and the closure of the gasworks, the land was derelict and contaminated. However, due to the scale of the brownfield site [see *figure 1*], the Greenwich Peninsula was of strategic importance to politicians and the LPA; offering a major opportunity for large-scale regeneration within the inner-city. Nonetheless, the regeneration of the Greenwich Peninsula has a turbulent history, with multiple stalled

attempts to develop the land. Hitherto, the vision for the Peninsula remains unrealised, with large plots currently under construction. Furthermore, despite the scale of this regeneration and condemnatory media attention (see Mathiason and Eriksson, 2015; Wainwright, 2015), the Greenwich Peninsula has received relatively little academic engagement, with the exception of Colenutt (2015).

The initial effort to unlock this brownfield land was accelerated with the formation of the Thames Gateway; an institutional regeneration framework that developed multiple de-industrialised brownfield sites across the east of London through adopting a market-driven approach; incorporating private sector stakeholders and objectives with State governance and subsidisation (Raco, 2005). Thus, the land ownership and governance structure have a complex history, involving both public and private bodies. RBG has maintained administrative responsibility, with the land repeatedly exchanging between private and public ownership. English Partnerships, a government regeneration agency, acquired the land and were responsible for delivering the Greenwich Peninsula redevelopment. Between 1997 and 2004, £225million of public money was invested to decontaminate and remediate the land (NAO, 2008), with expected financial returns to the State. Therefore, this redevelopment scheme has always had an invested public interest. This remediation was accompanied with significant infrastructural investment, which included the extension of the Jubilee Line in 1999; improving connectivity to the East and Central London. Nonetheless, whilst construction of residential development commenced in 2000, most of the land remained undeveloped and, in 2004, English Partnerships entered a land-disposal agreement; appointing Meridian Delta Ltd, a private sector consortium of Quintain and Lendlease, to deliver the Greenwich Peninsula regeneration over the following twenty years, with land released on a plot-by-plot basis. This structure of urban governance was driven by both public and private bodies which, as will be demonstrated in the following section, significantly differs from the 'development machine' facilitating the current masterplan.

In 2004, the GLA identified the Greenwich Peninsula as an 'opportunity area' in the London Plan: one of 39 brownfield sites designated for intensified regeneration at a high density, with a planning framework published exclusively for this site. The site is thus of strategic importance for addressing the assessed housing need in the borough. In 2004, outline planning consent was granted for the regeneration masterplan, which was designed by architects Farrell and Partners, working with the GLA and RBG. This proposed a high density, mixed-used and 'sustainable community', accommodating 10,010 new mixed-tenure homes, of which 38% would be affordable. However, the forecast rate of

development stalled and in 2012 the land was transferred to the GLA. In an attempt to accelerate the regeneration, the remaining 121 hectares of land were sold at a reduced payment to Knight Dragon, an international investor and developer from Hong Kong. This was supported with a £50 million grant from the GLA to subsidise the provision of affordable housing. However, in contrast to the original urban governance, the regeneration of the Greenwich Peninsula is now entirely developer-driven and DVAs have been instrumental to negotiating the development outcomes; lowering the level of affordable housing despite GLA subsidisation. In the following sections, this dissertation will focus on a deed of variation to the S106 agreement, as well as the subsequent formulation of the 2015 revised masterplan for the area, both of which were determined using DVAs as an evidence-base.

4.2 Deed of Variation

The acquisition of land by Knight Dragon accelerated the rate of development, bringing small plots of land forward through reserved matters applications. Nonetheless, the market and planning policy context had significantly altered since 2004, with a shift in Government and the introduction of the NPPF, as well as a newly adopted Local plan and London Plan. Accordingly, a 'deed of variation' was sought by Knight Dragon; altering the S106 agreement and the level of affordable housing that would be provided, which decreased from 38% to 21% (RBG, 2013b). Additionally, it altered the mixed-tenure design, confining the affordable units to less desirable plots. This variation was decided at the RBG Planning Committee and, as it was not a planning application, no public consultation occurred. The decision was justified with a DVA, demonstrating that it was not viable to provide 38% affordable housing, despite the subsidisation from the GLA. An independent assessor was appointed by RBG to scrutinise the DVA; however, he concluded that it was robust. This highlights the institutionalised trust in technical expertise and assumed objectivity of calculative instruments. Moreover, it demonstrates the opportunistic utilisation of DVAs to maximise development profit. Therefore, this highlights an imbalance of stakeholder power, with development outcomes asymmetrically benefiting the developer, at the expense of the local community.

The lack of public consultation evoked a sense of distrust from local communities who were marginalised from decision-making. In response, residents collectively submitted a Freedom of Information request to access the DVA that informed the deed of variation. However, RBG declined to disclose the DVA; claiming that this information was provided confidentially and that disclosure may dissuade developers from investing in the borough

(ICO, 2014). This was appealed and escalated to the First-tier Tribunal in 2015, where arguments both supported and repudiated public disclosure. Importantly, the decision ruled that the DVA should be publicly disclosed (First-tier Tribunal, 2015). The associated documentation illuminated the importance of public disclosure and participation and informs the discussion in the following section. Nonetheless, the decision-making had occurred prior to the public disclosure of the DVA and thus the public was unable to contest the decision. Furthermore, the local community were informed of the limitations of DVAs when scrutinising subsequent applications. Therefore, this case thus offers a compelling opportunity to explore the disclosure of DVAs and public participation.

4.3 2015 Masterplan



Figure 2 - Timeline of the planning process for the Greenwich Peninsula development. Source: Author.

In 2015, Knight Dragon sought to develop a new masterplan for the remaining 79.56 hectares of undeveloped land on the Greenwich Peninsula. As Knight Dragon is the landowner, it was thus in their interest to maximise the value of the land. Working with

architects Allies and Morrison and an array of planning consultants, they proposed a masterplan for a mixed-use development comprising six integrated neighbourhoods. In comparison to the previous masterplan, they proposed an increase in density and residential units, as well as additional public realm and green spaces (NLP, 2015b). Nonetheless, they maintained a decrease in affordable housing, proposing 22.7% across the masterplan area. This level was again legitimised using a DVA, despite the RBG Local Plan requiring a minimum of 35% affordable housing on developments comprising 10+ residential units (RBG, 2014). RBG commissioned an independent review, which concluded that the DVA was reasonable, but should be subject to Review mechanisms; stipulating that, if the development exceeded the viability forecasting, the provision of affordable housing would increase. Furthermore, the masterplan DVA was publicly disclosed; however, the document is 191 pages in length with technical inputs that make lay interpretation challenging. Therefore, it is important to explore how disclosure aided public participation during the planning process.

The developer-led masterplan was focused on utilising the planning process and the DVA to maximise profit. The organisational structure and stages of the planning processes are illustrated in *Figure 2*, which highlights the importance of the pre-planning stage to maximise land values and ensure deliverability. Knight Dragon sought outline planning permission; allowing elements of the application to be renegotiated through addressing 'reserved matters' in subsequent applications. As Robin (2018) notes, this planning instrument provides flexibility, allowing the phased masterplan to adjust to market conditions and ensuring indemnity. However, this is problematic for public participation, with reserved matters limiting what is contestable, and multiple revisions requiring consistent public engagement over long periods. Furthermore, this developer-led approach meant that the community was reliant on private-sector delivery of affordable housing and a strong public-private sector partnership was thus requisite to ensuring equitable development outcomes. Therefore, it was essential that the planning and DVA processes reflected this public interest; ensuring that the procurement of public assets was maximised, with related decision-making occurring in a transparent and accountable manner. Accordingly, the following analysis is focussed on both the pre-application and application stages; exploring processes of urban governance, stakeholder involvement and influence and opportunities for public participation.

5.0 Findings and Analysis

5.1 Urban Governance and Expertise

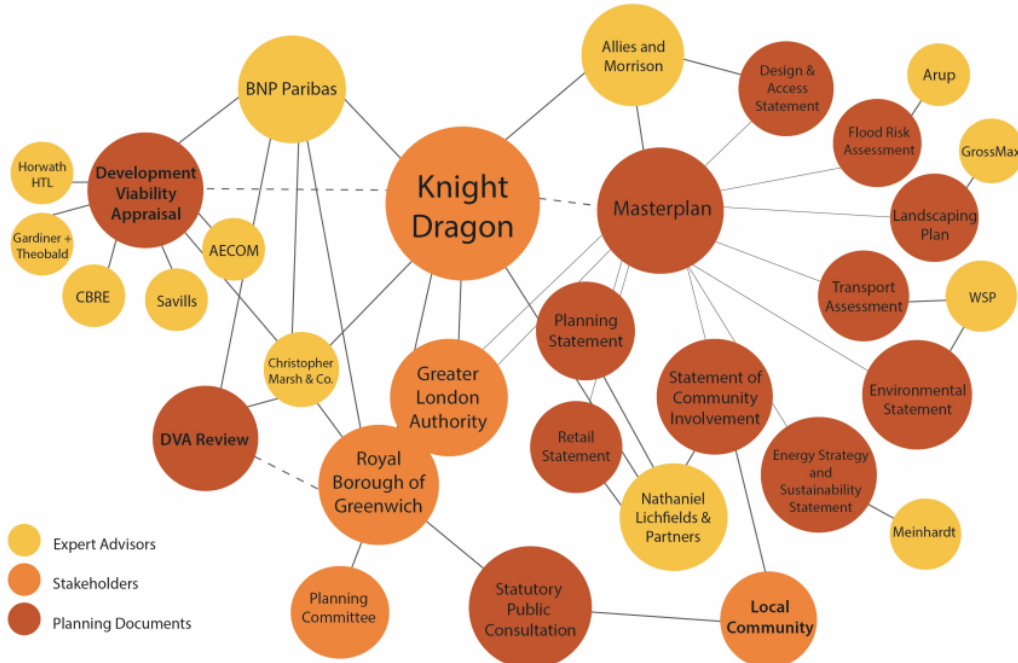


Figure 3 - Network of experts, documents and stakeholders involved in pursuing planning permission for the regeneration of the Greenwich Peninsula. Source: Author.

Understanding the structure of urban governance that shaped the redevelopment of the Greenwich Peninsula is important for identifying the stakeholders consulted. It is also important to identify the roles of each stakeholder, their level of influence and how this is governed. This involves recognising the institutional frameworks, technical documents, calculative instruments and expertise facilitating the development. It is thus within this existing structure that opportunities for greater stakeholder involvement can be identified. *Figure 3* illustrates the volume of expert consultants recruited and technical documents commissioned by Knight Dragon at the pre-application stage, as well as the experts recruited by RBG during the application process; demonstrating that the DVA is one of many technical documents and drawings submitted as part of the application process. Together, this assemblage confirms Raco et al's (2016) notion of the 'development machine'; compartmentalising each element and strategically recruiting specialist experts to efficiently deliver the development. *Figure 3* also reflects Robin's (2018) observation of

the central role of developers, who have responsibility for the masterplanning of this strategically important site. Accordingly, this developer-led approach meant that determining the parameters of what is deliverable, as well as the stakeholders and expertise that should be consulted, was the responsibility of Knight Dragon.

The complexity of this 'development machine' has significant implications for stakeholder involvement, with lay actors required to access and interpret the multiplicity of technical documents. This was highlighted by one interviewee who protested that:

'I think there are lots of things you can do as an amateur, once you've read a few of these things you can spot the bullshit. But it's the volume of bullshit you're confronted with on a big planning application. [...] And, how many of these things can people take on at once?'

(Respondent CG2)

This confirms the tension between technical expertise and lay participation discussed by Curry (2012), with the compartmentalisation and complexity of the planning process requiring communities to scrutinise multiple calculations and documents, which are presented as incontestable. This complexity is problematic and, as one respondent argued, is likely to dissuade some community groups from participating:

'The problem with these huge developments is the public can't take it all in. [...] Mostly they engage with the smallest developments, people can relate to them a lot better.'

(Respondent CR1)

Nonetheless, it is important to widen stakeholder involvement; allowing more actors to interrogate the technical calculations produced by experts and unlock the 'black-box' discussed by Rydin (2012). Therefore, it is important to ensure that DVAs are accessible to all stakeholders.

Table 4 summarises the eleven stage DVA modelling process. The developer appointed consultants BNP Paribas; an international banking, development and planning consultancy with an array of experience producing DVAs. This experience is stated in the beginning of the DVA report; explaining that BNP Paribas was recruited by the GLA to review its DVA model, as well as advising the public body responsible for financing affordable housing - the Homes and Communities Agency (now Homes England), on

maximising the procurement of planning obligations and affordable housing. This seeks to illustrate that BNP Paribas is a leading viability consultant, advising both public and private bodies to appraise ‘the value of affordable housing and economically and socially sustainable residential developments’ (2015: p.3). Here, their technical expertise is exhibited to create a façade of equitability, eliciting a sense of assurance from *all* stakeholders. However, this statement of expertise seeks to depoliticise the DVA; legitimising the bespoke model and presenting the rational calculations as indisputable, despite the politically contentious nature of site-specific DVAs. Therefore, it is crucial that DVAs are disclosed and interrogated to ensure that calculations are robust.

| | Stages of DVA Modelling | Stakeholder Involvement |
|----|--|---|
| 1 | Recruitment of expert consultants and discussion of brief, including consultation | <ul style="list-style-type: none"> • Knight Dragon • BNP Paribas |
| 2 | Assumptions: research on the economic and housing context | <ul style="list-style-type: none"> • BNP Paribas |
| 3 | Calculation of residential sales values, including market report and indicative pricing schedule | <ul style="list-style-type: none"> • Savills • CBRE |
| 4 | Calculation of market expectations for commercial revenue | <ul style="list-style-type: none"> • CBRE • Horwath HTL • Aecom |
| 5 | Development cost plan (including construction and contingency) | <ul style="list-style-type: none"> • Aecom • Gardiner + Theobald |
| 6 | Necessary developer’s profit is assumed - set at 20% | <ul style="list-style-type: none"> • Knight Dragon • BNP Paribas |
| 7 | Consideration of planning obligations (Including S106 and Community Infrastructure Levy). | <ul style="list-style-type: none"> • RBG • Knight Dragon |
| 8 | Calculation of development viability | <ul style="list-style-type: none"> • BNP Paribas |
| 9 | Assessment of model outputs to calculate viable level of affordable housing | <ul style="list-style-type: none"> • BNP Paribas |
| 10 | Drafting of DVA report and feedback | <ul style="list-style-type: none"> • BNP Paribas • Knight Dragon |
| 11 | Handover of DVA report and letter detailing offer of affordable housing to LPA | <ul style="list-style-type: none"> • BNP Paribas • Knight Dragon • RBG |
| 12 | DVA is uploaded to Planning Portal and becomes publicly disclosed | <ul style="list-style-type: none"> • RBG |

Table 4 - Modelling Process for Site-Specific Development Viability Appraisal. Source: Author

The brief for the DVA was devised by the developer and BNP Paribas who created a bespoke model; determining the model framework, appropriate inputs and stakeholder involvement. BNP Paribas was largely responsible for orchestrating this process; reflecting the autonomy of 'sector-led' practice and supporting McAllister's (2017) argument that there is a lack of formal governance and guidance regarding model inputs and stakeholder inclusion. *Table 4* demonstrates that BNP Paribas consulted smaller, specialist consultancies to influence the inputs. In comparison to the other technical documents illustrated in *Figure 3*, it is interesting to note the quantity of expert consultants consulted and involved in producing the DVA. However, *Table 4* also demonstrates there was no opportunity for community consultation. This reflects the expertise considered legitimate and worth consulting and highlights the marginalisation of non-technical and qualitative forms of knowledge. Furthermore, despite the authors labelling the DVA confidential, the report was publicly disclosed once the modelling, drafting and feedback stages were completed and submitted to the LPA. Nonetheless, this restricted stakeholder involvement and influence during the modelling stage. Therefore, the DVA process reflects the expertise considered legitimate and, in this case, excluded local communities.

| | Stages of DVA Review | Stakeholder Involvement |
|---|--|--|
| 1 | Recruitment of independent consultant to review the DVA | <ul style="list-style-type: none"> • RBG • Christopher Marsh & Co. |
| 2 | Scrutiny of DVA report, including discussion of inputs with stakeholders | <ul style="list-style-type: none"> • Christopher Marsh & Co. • RBG • Knight Dragon • BNP Paribas |
| 3 | Drafting of review letter, feedback and handover | <ul style="list-style-type: none"> • Christopher Marsh & Co. • RBG |
| 4 | Negotiation of planning obligations | <ul style="list-style-type: none"> • RBG • Knight Dragon |

Table 5 - Review Process of Site-Specific Development Viability Appraisal. Source: Author.

Nonetheless, whilst *Table 4* visualises the quantity of private expertise involved, *Table 5* illustrates that RBG scrutinised their assumptions during the review process. Moreover, due to the scale and strategic importance of the development, the application was referred to the GLA for further scrutiny. However, the planning reports demonstrate outstanding issues (GLA, 2015a; GLA, 2015b), which referred to the level of affordable housing. Accordingly, the DVA was requested to evidence that the maximum quantum of affordable housing had been proposed; demonstrating the legitimising function of DVAs.

Expert consultants Christopher Marsh & Co were appointed by RBG to conduct the DVA review, suggesting that the LPA did not possess the requisite expertise to conduct the review in-house. The brief was prepared by RBG planning officers and also included consultation with Knight Dragon and BNP Paribas; limiting stakeholder involvement to experts who informed both the DVA and the review. This stakeholder consultation is reflected in the review letter, which elucidates that the DVA had 'been the subject of intense discussion between RBG officers, ourselves and the applicants' (Christopher Marsh & Co., 2015: p.1); confirming a disequilibrium of stakeholder influence at the review stage. This is problematic as it demonstrates that the LPA also marginalised community stakeholders and qualitative knowledge from the review process. Furthermore, this network of both private and public expertise has problematised accountability; evoking scepticism, with the perception that LPAs are working with private-sector experts, as opposed to acting impartially and supporting the public interest. This was expressed by one respondent, who explained:

'I think that there is an issue there for the sector where the consultants are working for both sides, and maybe different people within the agencies working for both sides, but I think that public perception is really important - even if its not corrupt - there might be a perception that the advice isn't impartial. I think that's really important in terms of the integrity of the planning system'.

(Respondent CG1)

This quote indicates the importance of transparency and scrutiny to demonstrate accountability and ensure the robustness of both DVAs and reviews. Therefore, it is important to assess stakeholder involvement and influence to determine how this can be extended.

5.2 Stakeholder Involvement and Influence

As discussed, the degree of stakeholder involvement and influence is overseen by the experts appointed to conduct the DVA. Accordingly, opportunities for public consultation are determined by consultants and it is important to identify the roles and influence of the stakeholders involved. This will allow opportunities for the extension of stakeholder involvement to be identified. The DVA review assessed whether the proposed quantity of affordable housing was correct and is thus conducted in the public interest.

Nonetheless, when asked if there was scope to include community consultation during the review process, one interviewee explained:

'It certainly could have been and if it had been part of the brief that's what would have been done, but it wasn't. Not at that time.'

(Respondent C1)

This quote is significant as it suggests that it is possible to extend stakeholder involvement to communities. Moreover, it demonstrates a willingness from experts to include community consultation when instructed as part of the brief. Furthermore, when asked about their experience of consulting communities during DVA reviews, the same respondent described it:

'like letting the dog off the leash. There's so much enthusiasm that they want to know a lot more than is necessarily available.'

(Respondent C1)

This alludes to a degree of opacity, with varying levels of information being shared between stakeholders. This is likely to restrict public participation and thus extending stakeholder involvement must be supported with a sufficient degree of transparency and disclosure to facilitate participation. Therefore, at the DVA review stage, the LPA is accountable for determining the expertise considered legitimate and extending stakeholder involvement. Furthermore, these findings highlight the importance of narrowing the existing 'knowledge gaps' discussed by McAllister et al (2013a) to ensure that LPAs have the requisite expertise to instruct briefs that are inclusive; ensuring that decision-making is not 'sector-led'.

It is important to establish the motivation for the extension of stakeholder involvement. This was discussed by one respondent who explained that:

'sometimes, especially on larger schemes that are controversial, local authorities are often reluctant to take those sorts of decisions in isolation and probably for their own piece of mind they often will consult in order to cover their backs in case it turned out to be controversial or unpopular.'

(Respondent C1)

This quote reflects the use of extended stakeholder involvement to allow appraisers to legitimise the model outputs by increasing the level of ‘buy-in’ (McAllister et al, 2016); therefore, extending accountability to include local communities who contributed to determining the results. This is problematic as it seeks to utilise public participation to further legitimise calculations. Fundamentally, it is important to question the level of influence that consulted communities would achieve. Arguably, the ability of lay actors to influence DVA reviews and modelling is dependent on their understanding of the process. Moreover, achieving greater influence is dependent on the acceptance of non-technical expertise, as well as revising DVA models to include both quantitative and qualitative forms of knowledge. Nonetheless, this is necessary to ensure the recognition of local needs and aspirations; achieving sustainable and long-term objectives and promoting equitable development outcomes. As Elling (2017) suggested this will destabilise existing urban governance, rebalancing stakeholder involvement and influence. Therefore, it is important that extending stakeholder involvement enables the scrutiny of expert decisions, as opposed to facilitating the incontestability of calculative modelling.

Identifying opportunities for extended stakeholder involvement must be considered within the existing governance framework. The SCE submitted by Knight Dragon demonstrated two public exhibitions over six days, as well as regular meetings with local resident’s associations and community groups. This engagement was the responsibility of Nathaniel Lichfields and Partners, a consultancy experienced in planning and community engagement, who acted as the ‘interface’ between the public and developer. The consultation was branded as an opportunity ‘to open a new discussion with local people and businesses about what you want to see included in the final set of proposals’ (NLP, 2015c). The noun ‘discussion’ suggests a two-way dialogue. However, the SCE was conducted prior to the DVA and, therefore, it was not possible to raise concern of viability at this stage. Thus, this ‘discussion’ was confined within the boundaries set by the developer; restricting any opportunity to meaningfully discuss the level of affordable housing proposed. Furthermore, consultation responses complained of ‘a skimpy community consultation process’ (NLP, 2015a). Similarly, one interviewee condemned that:

‘Knight Dragon have been selective about engagement. [...] I get the impression they’re not that interested in consultation. We will try to force our way in but we’ll see if they ever contact us. No matter how many times you put your names down, if they think that you’re going to be a trouble maker they’re not going to tell you about it. It’s a very monolithic organisation, very hierarchical.’

(Respondent CG2)

This highlights the depoliticisation of large development schemes, with public consultation seen as a threat to efficiently delivering the scheme. It is thus important to ensure that processes for public consultation offer opportunities to address financial viability and affordable housing. Therefore, at the pre-application stage, there is currently limited opportunity to contribute to DVA modelling or raise concerns over the calculations; restricting the scope of what can be consulted on and neutralising the political complexity of large-scale urban redevelopment.

5.3 - Disclosure and Public Participation

As demonstrated, stakeholders are awarded differing levels of influence across the DVA modelling and review processes. Accordingly, opportunities for public scrutiny and influence of DVAs is limited, which thus inhibits effective participation in related decision-making. However, to determine how effective the recent revision to the NPPF is for extending stakeholder involvement and influence, it is necessary to recognise how the disclosure of DVAs can aid public participation. Significantly, the DVAs submitted to inform the development of the Greenwich Peninsula were the first that local communities had accessed. As discussed, the ability of local communities and lay actors to influence technical modelling is dependent on both stakeholder inclusion and their understanding of the processes; with the complexity of DVAs creating a significant barrier to lay interpretation. However, the decision-notice from the First-tier Tribunal highlighted that the assumed technicality should not prevent the public from accessing DVAs. The report states that: ‘public understanding of the issues fails at the starting line if such information is concealed’ (First-Tier Tribunal, 2015). The argument for public disclosure continues, stating that:

‘One argument against disclosure of the redacted information was that those receiving it would be unlikely to understand it. [...] It is increasingly open to question whether the public should be expected to accept the “expert view” without the opportunity to see the supporting factual evidence’ (First-Tier Tribunal, 2015).

This reinforces the importance of opening the ‘black box’, which requires unimpeded access to DVAs and related reviews. Thus, greater stakeholder interrogation is likely to increase robustness and restrict opportunities for opportunistic bias. Therefore, this

confirms Sheppard et al's (2015) argument that transparency is likely to increase trust in both technical calculations and decision-making. Nonetheless, it also disputes Sheppard et al's (2015) claim that partial disclosure is sufficient, demonstrating instead that full disclosure is necessary to allow comprehensive scrutiny and sensitivity-analysis. Accordingly, it is important that the disclosed DVAs are not redacted.

The ability of lay actors to interpret the disclosed DVAs is problematic and, due to the heterogeneity of communities, this is likely to be inconsistent. However, one interviewee explained that:

'as indeed happened on the peninsula, you are getting people now who are in the business, like me, who just happen to be local residents who are aware and are not going to be phased by an authority adopting blocking tactics.'

(Respondent C1)

This demonstrates that some communities possess the requisite knowledge to interpret technical calculations. Nonetheless, in instances where communities may not be as equipped, the First-tier Tribunal report argued that communities may appoint:

'expert advice which would [...] be likely to expose the weakness, susceptibility to change over time, or other uncertainties apply to assumptions and values. This could be achieved in part through comparison with other models or information in the public domain [...] in our view further disclosure of detail would enrich the debate taking place' (First-Tier Tribunal, 2015).

Another respondent concurred, arguing that:

'I think that there should be some resource for an independent body to be able to do that on a resident's behalf. They can do the interpretation, and then they can just explain in plain English to residents whether it stacks up or not. So that's not an insurmountable barrier. I think that any disclosure helps in itself.'

(Respondent CG1)

As previously argued, subjecting DVAs to heightened levels of scrutiny is necessary to improve the robustness of calculations. However, commissioning experts to assess the DVA and explain the calculations on behalf of lay actors is likely to continue the reliance on

private-sector expertise and thus does not address the existing knowledge gap. Therefore, it is important to ensure the provision of resources that can assist lay actors in interpreting DVAs and thus widen stakeholder involvement and influence. Furthermore, this may encourage more community groups to participate by eliminating the barriers presented by technical complexity.

The responses raised during the statutory consultation to the 2015 masterplan demonstrate that the local community became informed of the limitations of DVAs; indicating that the disclosure of the DVA concerning the deed of variation familiarised the community with the contentiousness of viability. The officer report recorded concern from residents that

‘Given the issues of the lack of openness and transparency on viability that have been exposed [...] it is expected that any deviation from the Council’s policy on affordable housing [...] should require the viability report submitted by the developer and subsequent independent assessment be made fully available to both the members of the planning committee and wider public’ (RBG, 2015).

Once disclosed, other community groups inferred that the

‘BNP Paribas report does no more than claim that a wholly private development would make an inadequate profit. Such a scheme is not proposed nor would it be approved. No attempt is made to model a realistic scheme including affordable housing nor any sensitivity testing based on cost and selling price variables. Sensitivity testing is essential for a scheme with a 20 year build period and they would expect RBG’s independent assessor to require a more thorough approach’ (RBG, 2015).

This was complemented by another group’s statement advising ‘that further sensitivity testing in the financial viability report is required by the Council’s independent assessor’ (RBG, 2015). The language of these statements demonstrates that public disclosure has increased the community’s awareness of DVAs and, through familiarisation, allowed them to interpret and to some extent scrutinise the calculations. From this data, it is arguable that disclosure has heightened the effectiveness of public participation; with communities acquiring an increased ability to contest the provision of affordable housing during the application and decision-making stages. Therefore, this presents a strong

argument for public disclosure, demonstrating that this will narrow existing 'knowledge gaps' and extend stakeholder involvement; destabilising the hegemonic imbalance of stakeholder power that facilitates the economic interests of developers and allowing local communities to scrutinise the calculations of experts.

This analysis has demonstrated the importance of disclosure; however, public disclosure and scrutiny of DVAs can only be effective when achieved prior to the decision-making stages. This concerns both the DVA modelling and review stages; however, the existing lack of guidance does not determine the stage at which public disclosure should occur. However, one interviewee explained that:

'Normally applications that have a viability assessment are the types that would be reported to committee or planning board, so by the time the officer's report is published, that independent assessor's report would have been published on the website.'

(Respondent LPA 1)

This is significant as it would ensure that local communities can express their interpretation of the DVA review during the committee meeting and thus engage in decision-making. Fundamentally, however, DVAs are no longer a material consideration, despite being a central consideration and having a significant impact on the equitability of development outcomes. This is problematic as it creates uncertainty over the extent to which public interpretation of DVAs can influence decision-making, with the weighting given to viability determined by the decision-maker. However, when asked if they communicated their interpretation to the LPA, one interviewee pessimistically responded:

'frankly, I wouldn't try lobbying the council directly because of the experience that I had with the Freedom of Information request was so obstructive, I didn't get a sense that there was any willingness there to engage.'

(Respondent CG1)

This reluctance to participate reflects the aforementioned public scepticism over the impartiality and accountability of LPAs, which has evoked a sense of distrust and marginalisation. Nonetheless, it remains crucial to interrogate the calculations of experts and prevent the 'black-boxing' of information. Accordingly, it is important that the NPPF policies concerning viability are supported with guidance that encourages disclosure prior

to decision-making. In doing so, it is likely that the effectiveness of public participation will increase, with decision-making reflecting the long-term needs and aspirations of local communities.

6.0 Conclusions

6.1 Summarisation of Research and Conclusions

This dissertation has sought to determine the extent to which the recent revision to the NPPF, advocating the public disclosure of development viability appraisals, can aid public participation in decision-making and contribute to achieving equitable development outcomes. Existing research focused on public participation in the production of area-wide DVAs, although this too remains limited. This research has added to this debate; identifying the stakeholders involved and their respective responsibilities in processes of modelling, review and related decision-making for site-specific DVAs. It has also sought to understand how disclosure and greater transparency can extend stakeholder involvement and allow the inclusion of non-technical expertise.

Focusing on the case of the Greenwich Peninsula, this dissertation has highlighted the autonomy given to private-sector consultants to define both modelling processes and stakeholder consultation. The research has demonstrated that this allows experts to determine the stakeholders and forms of knowledge considered legitimate, which has resulted in an imbalance of stakeholder power at the DVA modelling, review and decision-making stages. The research also reflected that the complexity of DVAs has problematised the ability of lay actors to interpret technical calculations, which is important to reduce the 'knowledge gaps' and unlock the 'black box'; decreasing the reliance on experts and restricting opportunities for opportunistic bias. Interviews with community groups evidenced the need for resources to support the lay interpretation of DVAs. Interestingly, since commencing this dissertation, the MHCLG (2019a) has begun a pilot study, developing templates for simplified executive reviews and prototypes for a publicly accessible index of DVAs. Whilst hitherto only 4 LPAs have participated, this is promising for the simplification and increased accessibility of DVAs. Furthermore, the research has evidence that greater stakeholder involvement and influence requires the acceptance of non-technical and experiential expertise, which will require the revision of DVA models to assess both quantitative and qualitative knowledge. Therefore, public disclosure offers an opportunity to interpret and scrutinise DVAs; ensuring modelling is robust and destabilising the hegemonic imbalance of stakeholder power.

Fundamentally, this case study revealed a community informed of the limitations of DVAs, which was achieved through previous disclosure of the DVA concerning the deed of variation. The research demonstrated that this familiarisation enhanced public participation

at the decision-making stage, with statutory consideration given to their appeal for full disclosure and sensitivity analysis. Additionally, this has highlighted the importance of achieving disclosure prior to decision-making. This adds to the debate of transparency presented by Sheppard et al (2015), evidencing that effective stakeholder involvement and influence requires the disclosure of un-redacted DVAs. However, to ensure that DVAs are publicly disclosed, it is important that NPPF policy guidance is tightened, with disclosure becoming a mandatory requirement.

This dissertation also revealed the importance of establishing the motivation for disclosure. Building upon McAllister et al's (2016) notion of 'buy-in', this research evidenced instances where communities were consulted during DVA reviews to further legitimise expert decisions and make calculations incontestable. This highlighted the need for LPAs to recognise their responsibility for transparency and accountability. Additionally, the documentation evidenced that opportunities for public consultation during the pre-application stage were limited as they occurred before the DVA modelling. This adds to the research of Raco et al (2016); demonstrating that SCEs do not provide an opportunity to discuss DVAs and thus further limit the extent to which the public can effectively influence the provision of affordable housing. Moreover, the research found that consultation was both selective and insubstantial, seeking to neutralise the political complexity of site-specific DVAs and urban regeneration. Therefore, this dissertation has highlighted that opportunities for public consultation must be reconsidered to allow the disclosure and discussion of DVAs.

In conclusion, the public disclosure of DVAs will heighten transparency and extend stakeholder involvement; leading to more effective and democratic public participation. Furthermore, un-redacted public disclosure presents an opportunity for collective resistance, with public participation offering a 'counter-power' to resist institutionalised imbalances of stakeholder power and the short-term economic objectives of developers. Therefore, the NPPF policy innovation, advocating the public disclosure of DVAs, is likely to aid public-participation in decision-making and deliver equitable development outcomes that address local need. However, this will only be effective if policies are tightened to ensure that full disclosure occurs.

6.2 Future Research

The complexity of urban governance and DVA modelling means that this research has merely scratched the surface of how effective public participation can be achieved. Future research is required to determine how the public disclosure of DVAs, as well as extended

stakeholder involvement, may reconfigure the role of experts in DVA modelling. Moreover, it is also important to understand how the disclosure of DVAs may reconfigure public participation during both the pre-application and statutory consultations. Furthermore, additional research is required to develop mechanisms to increase the accessibility of DVAs and assist with lay interpretation. For instance, as piloted by the MHCLG, developing online indexes and frameworks for concise summarisation.

7.0 Reference List:

Albrechts, L. (2004). Strategic (Spatial) Planning Reexamined. *Environment and Planning B: Planning and Design* [online] 31: 743-758. Available from: doi:10.1068/b3065.

[Accessed 1 August, 2019].

Allies and Morrison. (2015). *Greenwich Peninsula 2015 Masterplan: Design and Access Statement*. Available from: <https://planning.royalgreenwich.gov.uk/online-applications/>.

[Accessed 1 August, 2019].

Barker, K. (2004). *Review of Housing Supply: Final Report*. London: Crown Copyright, p. 11-120.

BNP Paribas. (2015). *Financial Viability Report: Greenwich Peninsula 2015 Masterplan*. Available from: <https://planning.royalgreenwich.gov.uk/online-applications/>. [Accessed 1 August, 2019].

Booth, P. A. (2012). The Unearned Increment: Property and the Capture of Betterment Value in Britain and France. In: Ingram, G. K, and Hong, Y. eds. *Value Capture and Land Policies*. Cambridge: Lincoln Institute of Land Policy, p. 74-93.

Bowie, D. (2010). *Politics, Planning and Homes in a World City*. New York: Routledge.

Christophers, B. (2014). Wild Dragons in the City: Urban Political Economy, Affordable Housing Development and the Performative World-making of Economic Models. *International Journal of Urban and Regional Research* [online], 38 (1): 79-97. Available from: doi: 10.1111/1468-2427.12037. [Accessed 1 August, 2019].

Christopher Marsh & Co. (2015). Letter: *Re. Greenwich Peninsula Deed of Variation*. Available from: http://crappistmartin.github.io/images/greenwichpenwest_appraisal.pdf. [Accessed 1 August, 2019].

Colenutt, R. (2015). Viability Assessment and Freedom of Information. *Highbury Group*. Available from: <https://www.westminster.ac.uk/sites/default/public-files/general-documents/>

Highbury-Group-Viability-Assessment-and-Freedom-of-Information-1-2015.pdf. [Accessed 1 August, 2019].

Colenutt, R., Cochrane, A., and Martin, F. (2015). The Rise and Rise of Viability Assessment. *Town and Country Planning* [online] 84 (10): 453–458. Available from: http://oro.open.ac.uk/45179/3/_userdata_documents4_dj4784_Desktop_Tensions_Viability_paper_viability_2015.pdf. [Accessed 1 August, 2019].

Critchley, V. (2015). Planning Ahead: The Pros and Cons of Different Viability Review Mechanisms in Development Schemes. *RICS Land Journal*: 14-15. Available from: https://moodle-snapshot.ucl.ac.uk/18-19/pluginfile.php/430484/mod_resource/content/1/Critchley%20planning%20ahead.pdf. [Accessed 1 August, 2019].

Curry, D. (2012). Community Participation in Spatial Planning: Exploring Relationships Between Professional and Lay Stakeholders. *Local Government Studies* 38 (3): 345-366. Available from: doi:10.1080/03003930.2011.642948. [Accessed 1 August, 2019].

Department for Communities and Local Government (DCLG). (2012). *National Planning Policy Framework*. London: DCLG. Available from: [Available from: https://www.gov.uk/guidance/national-planning-policy-framework](https://www.gov.uk/guidance/national-planning-policy-framework). [Accessed 1 August, 2019].

Edwards, M. (2016). The Housing Crisis and London. *City* [online], 20 (2): 222-237. Available from: doi:10.1080/13604813.2016.1145947 [Accessed 1 August, 2019]

Elling, B. (2017). Communicative Planning as Counter-Power. *International Planning Studies* [online], 22 (3): 226-241. Available from: doi:10.1080/13563475.2016.1253458. [Accessed 1 August, 2019].

First-Tier Tribunal. (2015). EA/2014/0122. *Decision Notice*. Available from: <https://www.local.gov.uk/sites/default/files/documents/royal-borough-greenwich-d8a.pdf>. [Accessed 1 August, 2019].

Forester, J. (1989). Understanding Planning Practice. In: *Planning in the Face of Power*. Berkeley: University of California Press, p.135-160.

Greater London Authority (GLA). (2004). *The London Plan*. [Online]. London: City Hall. Available from: https://www.london.gov.uk/sites/default/files/the_london_plan_2004.pdf. [Accessed 1 August, 2019].

GLA. (2015). *Planning Report D&P/0519q/01*. London: GLA. Available from: https://www.london.gov.uk/sites/default/files/PAWS/media_id_22841/greenwich_peninsula_masterplan_report.pdf. [Accessed 1 August, 2019].

GLA. (2015). *Planning Report D&P/0519q/02*. London: GLA. Available from: https://www.london.gov.uk/sites/default/files/PAWS/media_id_285727/greenwich_masterplan_report.pdf [Accessed 1 August, 2019].

GLA. (2017). *Homes for Londoners: Affordable Housing and Viability Supplementary Planning Guidance*. [Online]. London: City Hall. Available from: https://www.london.gov.uk/sites/default/files/ah_viability_spg_20170816.pdf. [Accessed 1 August, 2019].

Hart, T. (2015). The Management of Development. In: Cullingworth, B., and Nadin, V. (eds.) *Town and Country Planning in the UK*. 15th Edn. New York: Routledge, p. 137-198.

Harvey, D. (1989). From Managerialism to Entrepreneurialism: The Transformation in Urban Governance in Late Capitalism. *Geografiska Annaler. Series B, Human Geography* [online], 71 (1): 3-17. Available from: http://urpa3301.weebly.com/uploads/4/0/9/2/4092174/04b.harvey_1973_.pdf. [Accessed 1 August, 2019].

Healey, P. (1996). The Communicative Turn in Planning Theory and its Implications for Spatial Strategy Formation. *Environment and Planning B: Planning and Design* [online] 23: 217-234. Available from: doi:10.1068/b230217. [Accessed 1 August, 2019].

Hillier, J. (2000). Going Round the Back? Complex and Informal Action in Local Planning Processes. *Environment and Planning A* [online] 32: 33-54. Available from: doi:10.1068/a321.

Holman, N., Mossa, A. and Pani, E. (2017). Planning, Value(s) and the Market: An Analytic for "What Comes Next?". *Environment and Planning A: Economy and Space* [online], 50

(3): 608-626. Available from: doi: 10.1177/0308518X17749730. [Accessed 10 August, 2019].

Housing, Communities and Local Government Committee (HCLGC). (2018). *Land Value Capture*. HC776. London: House of Commons. Available from: <https://publications.parliament.uk/pa/cm201719/cmselect/cmcomloc/766/766.pdf>. [Accessed 2 April, 2019].

Information Commissioner's Office (ICO). (2014). FER0524770. *Decision Notice*. Available from: https://ico.org.uk/media/action-weve-taken/decision-notices/2014/977128/fer_0524770.pdf. [Accessed 1 August, 2019].

Lock, D. (2016). Viability and Planning. *Town and Country Planning* 85 (9): 348-349.

Mathiason, N., and Eriksson, C. (2015). 'Dismay Doesn't Do it Justice': How a Secret System Was Used to Axe Hundreds of Affordable Homes. *The Bureau of Investigative Journalism* [online]. Available from: <https://www.thebureauinvestigates.com/stories/2015-05-26/dismay-doesnt-do-it-justice-how-a-secret-system-was-used-to-axe-hundreds-of-affordable-homes-on-britains-most-iconic-construction-site>. [Accessed 1 August, 2019].

McAllister, P. (2017). The Calculative Turn in Land Value Capture: Lessons from the English Planning System. *Land Use Policy* [online], 63 (1):122-129. Available from: doi: 10.1016/j.landusepol.2017.01.002. [Accessed 1 August, 2019].

McAllister, P., Street, E. and Wyatt, P. (2013). Inside the Black Box: Unravelling the Development Viability Appraisal Process. *Working Papers in Real Estate & Planning* 12/13 [online]: 1-34. Available from: <http://centaur.reading.ac.uk/35154/1/wp1213.pdf>. [Accessed 1 August, 2019].

McAllister, P., Street, E., and Wyatt, P. (2015). Governing Calculative Practices: An Investigation of Development Viability Modelling in the English Planning System. *Urban Studies* [online], 53 (11): 2363-2379. Available from: doi: 10.1177/0042098015589722. [Accessed 1 August, 2019].

McAllister, P., Street, E. and Wyatt, P. (2016). Governing Calculative Practices: An Investigation of Development Viability Modelling in the English Planning System. *Urban Studies* [online], 53 (11): 2363-2379. Available from: doi:10.1177/0042098015589722. [Accessed 1 August, 2019].

McAllister, P., Wyatt, P., and Coleman, C. (2013). Fit for Policy? Some Evidence on the Application of Development Viability Models in the United Kingdom Planning System. *Town Planning Review* [online], 84 (4): 517-541. Available from: doi: 10.3828/tpr/2013.26. [Accessed 1 August, 2019].

MHCLG. (2019). *National Planning Policy Framework*. London: MHCLG. Available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf. [Accessed 1 August, 2019].

Ministry for Housing, Communities and Local Government (MHCLG). (2019). *Digital Land: Project: Developer Contributions* [online]. Available from: <https://digital-land.github.io/project/developer-contributions/>. [Accessed 1 August, 2019].

National Audit Office (NAO). (2008). *The Regeneration of the Greenwich Peninsula: A Progress Report*. Hc 338. Available from: <https://www.nao.org.uk/wp-content/uploads/2008/07/n0708338.pdf>. [Accessed 1 August, 2019].

Nathaniel Lichfield & Partners (NLP). (2015). *Greenwich Peninsula 2015 Masterplan: Planning Addendum Consultation Response*. London: Nathaniel Lichfield & Partners. Available from: <https://planning.royalgreenwich.gov.uk/online-applications/>. [Accessed 1 August, 2019].

NLP. (2015). *Greenwich Peninsula 2015 Masterplan: Planning Statement*. London: Nathaniel Lichfield & Partners. Available from: <https://planning.royalgreenwich.gov.uk/online-applications/>. [Accessed 1 August, 2019].

NLP. (2015). *Greenwich Peninsula 2015 Masterplan: Statement of Community Engagement*. London: Nathaniel Lichfield & Partners. Available from: <https://planning.royalgreenwich.gov.uk/online-applications/>. [Accessed 1 August, 2019].

Raco, M. (2005). A Step Change or a Step Back? The Thames Gateway and the Re-birth of the Urban Development Corporations. *Local Economy* [online] 20 (2): 141-153. Available from: doi:10.1080/13575270500053241. [Accessed 1 August, 2019].

Raco, M., Street E., and Freire-Trigo, S. (2016). The New Localism, Anti-Political Development Machines, and the Role of Planning Consultants: Lessons from London's South Bank. *Territory, Politics, Governance: The Neoliberal City: Theory, Evidence, Debates* [online], 4 (2): 216-240. Available from: doi:10.1080/21622671.2015.1036912. [Accessed 1 August, 2019].

Robin, E. (2018). Performing Real Estate Value(s): Real Estate Developers, Systems of Expertise and the Production of Space. *Geoforum* [online]: 1-11. Available from: doi: 10.1016/j.geoforum.2018.05.006. [Accessed 1 August, 2019].

Royal Borough of Greenwich (RBG). (2013). *Planning Board 28/02/2013: Minutes*. London: Royal Borough of Greenwich. Available from: <https://committees.royalgreenwich.gov.uk/documents/g2978/Printed%20minutes%2028th-Feb-2013%2018.30%20Planning%20Board.pdf?T=1>. [Accessed 1 August, 2019].

Royal Borough of Greenwich (RBG). (2013). *Planning Board 28/02/2013: Officer Report*. London: Royal Borough of Greenwich. Available from: <https://committees.royalgreenwich.gov.uk/documents/s25610/005%20-%20Greenwich%20Peninsula%2011%20Plot%20Deed%20of%20Variation.pdf>. [Accessed 1 August, 2019].

Royal Borough of Greenwich (RBG). (2014). *Royal Greenwich Local Plan: Core Strategy with Detailed Policies*. London: RBG. Available from: https://www.royalgreenwich.gov.uk/info/200191/planning_policy_and_strategy/869/local_development_framework/2. [Accessed 1 August, 2019].

Royal Borough of Greenwich (RBG). (2015). *Planning Board 08/09/2015: Officer Report*. London: Royal Borough of Greenwich. Available from: <https://committees.royalgreenwich.gov.uk/documents/s42919/006%20-%20Peninsula%20Masterplan%20Revised.pdf>. [Accessed 1 August, 2019].

Rydin, Y. (2012). Using Actor-Network Theory to Understand Planning Practice: Exploring Relationships Between Actants in Regulating Low-Carbon Commercial Development. *Planning Theory* [online], 12 (1): 23-45. Available from: doi:10.1177/1473095212455494. [Accessed 1 August, 2019].

Sayce S., Garside, P., Harris, R., Crosby, N. and Parsa, A. (2017). Viability and the Planning System: The Relationship between Economic Viability Testing, Land Values and Affordable Housing in London. Gloucester: Royal Agricultural University. Available from: http://www.henley.ac.uk/files/pdf/schools/repViability_and_the_Planning_System_Research_January_2017.pdf. [Accessed 1 August, 2019].

Sheppard, A., Burgess, S., and Croft, N. (2015). Information is Power: Public Disclosure of Information in the Planning Decision-Making Process. *Planning Practice and Research* [online], 30 (4): 443-456. Available from: doi: 10.1080/02697459.2015.1045225. [Accessed 1 August, 2019].

Stake, R. E. (2005). Qualitative Case Studies. In: Denzin, N. K, and Lincoln, Y. S. eds. *The Sage Handbook of Qualitative Research*. 3rd Edn. London: Sage Publications, p. 443-466.

Steinberg, P. F. (2015). Can We Generalise from Case Studies? *Global Environmental Politics* [online], 15 (3): 152-175. Available from: doi:10.1162/GLEP_a_00316. [Accessed 10 August, 2019].

United Nations Economic Commission for Europe (UNECE). (1998). *Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters*. Available from: <https://www.unece.org/fileadmin/DAM/env/pp/documents/cep43e.pdf>. [Accessed 1 August, 2019].

Vogelpohl, A. (2018). Consulting as a Threat to Local Democracy? Flexible Management Consultants, Pacified Citizens, and Political Tactics of Strategic Development in German Cities. *Urban Geography* [online] 39 (9): 1345-1365. doi: 10.1080/02723638.2018.1452872. [Accessed 1 August, 2019].

Wainwright, O. (2015). Revealed: How Developers Exploit Flawed Planning System to Minimise Affordable Housing. *Guardian* [online]. Available from: <https://www.theguardian.com/cities/2015/jun/25/london-developers-viability-planning-affordable-social-housing-regeneration-oliver-wainwright>. [Accessed 1 August, 2019].

8.0 Appendix

8.1 Consent Form



Bartlett School of Planning

Viability and Public Participation Research

This research explores how the recent revision to the National Planning Policy Framework, which advocates the public disclosure of viability assessments, can aid public participation and contribute to achieving equitable outcomes for local communities. The research is focused on Knight Dragon's development of the Greenwich Peninsula between 2013-2015; reflecting upon how various stakeholders are consulted throughout the viability modelling and decision-making processes.

1. I confirm that I understand the intent of the research detailed on the 'Information Sheet' provided.
2. I confirm that I have had an opportunity to ask questions regarding the project and my involvement in the research.
3. I understand that interview data will remain anonymous throughout the data analysis and dissertation report, identified only with a general identifier e.g. 'Consultant'
4. I understand that participation in the research is entirely voluntary and I retain the right to withdraw from the research at any point without providing a reason.
5. I understand that the interviews will be audio recorded and transcribed. I understand I may request to view the interview transcript.
6. I understand that the information I provide during interviews will only be used for the purposes of this research. The anonymised data will be used in the written dissertation and submitted to UCL for the award of a Masters degree.
7. I understand that any personal data provided will remain confidential and will be deleted once the research has been completed.

I hereby give consent to the above:

Signature:

Date:

8.2 Interview Questions

LPA

Introductory Questions:

- What is your background?
- Could you tell me about your involvement in the Greenwich Peninsula development?

Politics of Expertise:

- What is your experience of working with DVAs?
- How does the council interpret and review the DVAs submitted by developers?
- If commissioning an independent review, does the brief include engagement with local community groups?
- Do you think that there is scope to do this?

Urban Governance / Asymmetries of Power:

- Once DVAs have been conducted, how are planning obligations negotiated?
- How are the outcomes communicated with the public?

NPPF and Public Disclosure:

- In 2016, RBG introduced a policy requiring applicants to disclose a "full un-redacted viability assessment" if the proposal was not policy compliant. How successful was this in achieving disclosure?
- To what extent did this policy innovation enhance public participation?
- A recent revision to the NPPF advocates that DVAs 'should be made publicly available'. Have you noticed an increase in the number of DVAs being publicly disclosed in full?
- To what extent do you feel that this will encourage an increase in the disclosure of DVAs?
- How likely do you think it is that the disclosure will encourage public scrutiny and participation in decision-making? what is the reason for this?
- What existing processes does RBG have to allow public scrutiny of disclosed DVAs prior to decision-making?
- If none, how do you think this could be accommodated within existing planning processes?
- To what extent do you think that full disclosure of DVAs will strengthen plan-led decision-making?

Concluding Questions:

- Looking forward, do you think that that emphasis given to viability (often at the expense of environmental and social aims) in the NPPF should be maintained? Why?
- Aside from the Greenwich Peninsula, do you have any other experiences or involvement with DVAs?

Community Groups

Introductory Questions:

- What are the aims of your community group? What is the composition?
- How does your group engage with local issues relating to planning?
- How did you participate in the consultation regarding the Greenwich Peninsula?
- Were you ever invited to comment on the DVA?
- How did you find this process?

Politics of Expertise:

- What 'expertise' does your group possess to interpret and contest DVAs?
- Following the tribunal and public disclosure, did you read the Knight Dragon viability assessment and the independent review of this?
- Did you read the DVA for the 2015 masterplan?
- What was your experience of interpreting this?
- How did you communicate your interpretation of the DVA to the LPA?
- To what extent do you feel that your interpretation of the DVA had an impact on decision-making?

Urban Governance / Asymmetries of Power:

- Prior to public disclosure, did you trust RBG's interpretation/review of the DVA and their decision-making? Why?
- Following the disclosure of the DVA, did this increase your trust in RBG's decision? Why?
- Would you prefer scrutiny of DVAs to be conducted by officers within the council, or outsourced to independent expert consultants? Why?

NPPF and Public Disclosure:

- The recent revision to the NPPF advocates that DVAs 'should be made publicly available'. To what extent do you think that the public disclosure of viability assessments will strengthen public participation in decision-making?
- Would you like a more formal process to be established, whereby the public could be consulted on the disclosed viability assessments / review of viability assessments, prior to decision-making?
- Are you likely to access and interpret future viability assessments on other developments in the borough?

Concluding Questions:

- Looking forward, do you think that that emphasis given to viability (often at the expense of environmental and social aims) in the NPPF should be maintained? Why?
- Aside from the Greenwich Peninsula, do you have any other experiences or involvement with DVAs?

Consultants

Introductory Questions:

- What is your background?
- Could you tell me about your involvement in the Greenwich Peninsula development?

Politics of Expertise:

- What is your experience of working with DVAs?

Urban Governance / Asymmetries of Power:

- How do you ensure that the DVAs / reviews are fair to both clients and communities?
- When conducting the DVA for the Greenwich Peninsula development, did you consult communities?
- If yes, how did you include the knowledge gathered from public consultations in the viability modelling?
- If no, why? do you think there is scope for public consultation?
- Once DVAs have been conducted, do you present the draft / conclusion(s) to stakeholders involved in the consultation?
- How do you account for sensitivity analysis in your viability model? Why?

NPPF and Public Disclosure:

- The recent revision to the NPPF advocates that DVAs 'should be made publicly available'. Have you noticed an increase in the number of DVAs being publicly disclosed in full?
- To what extent do you feel that the NPPF revision will encourage an increase in the full disclosure of DVAs?
- How likely do you think it is that disclosure of DVAs will encourage public participation in modelling / decision-making regarding? Why?

Concluding Questions:

- Looking forward, do you think that that emphasis given to viability (often at the expense of environmental and social aims) in the NPPF should be maintained? Why?
- Aside from the Greenwich Peninsula, do you have any other experiences or involvement with DVAs?

Councillors

Introductory Questions:

- What is your background?
- Could you tell me about how you were involved in the decision-making regarding the Greenwich Peninsula development? were you involved in the planning committee?

Politics of Expertise:

- What is your experience of working with DVAs?
- Did you have an opportunity to view the DVA for the Peninsula?
- (If on the planning committee) how do you scrutinise the DVA / planning officer's review of it?

Urban Governance / Asymmetries of Power:

- Did you have an opportunity to communicate concerns from the public regarding the DVA?

NPPF and Public Disclosure:

- The recent revision to the NPPF advocates that DVAs 'should be made publicly available'. Have you noticed an increase in the number of DVAs being publicly disclosed in full?
- How likely do you think it is that the public disclosure of DVAs will encourage public participation in decision-making at committee meetings? Why?
- To what extent do you think that full disclosure of DVAs will strengthen plan-led decision-making?

Concluding Questions:

- Looking forward, do you think that that emphasis given to viability (often at the expense of environmental and social aims) in the NPPF should be maintained? Why?
- Aside from the Greenwich Peninsula, do you have any other experiences or involvement with DVAs?

8.3 Document Review: Deed of Variation

Table 6 - References to viability and consultation (excerpted statements)

| Document | Author | Significant Statements |
|-------------------------------------|---|--|
| Planning Board - Officer Report | RBG | <ul style="list-style-type: none"> • '[Greenwich Conservation Group] are greatly concerned that the responsibility for the preparation of a replacement Masterplan has been given to the developer, Knight Dragon, as opposed to adopting the more independent route of the Council commissioning consultants to undertake a review of the Masterplan. [...] the developer-led approach being adopted on one of the most important regeneration sites in the borough, the Greenwich Peninsula, puts the council at a disadvantage in bringing to bear the necessary dispassionate appraisal of what is currently being proposed.' • '[Greenwich Conservation Group] are pleased to note the applicant has commissioned a financial viability report in support of the application but regret that only an abridge version has been made available for public consumption. The group trust that, well in advance of any Planning Board meeting called to determine this application, the full report will be made available to members along with the Council's independent assessment of the full report' • '[Greenwich Society] 'Recent developments have been providing much smaller percentages of affordable housing, on the grounds of "viability assessment" claims. Should this continue on the scale here, it would stand to make nonsense of Council policy in this respect and its strategic objective to foster sustainable and cohesive communities.' • 'The financial viability assessment undertaken in support of this proposal has been examined and found to be robust by an independent assessor commissioned by the Council.' • 'No consultation was undertaken in respect of the proposal being as it is not a planning application but a variation of the Section 106 Agreement' |
| First-Tier Tribunal Decision Notice | Information Commissioner's Office (ICO) | <ul style="list-style-type: none"> • 'We find it particularly hard to accept that the pricing and other assumptions embedded in a viability appraisal are none of the public's business. They are central facts determine the difference between viability and non viability. Public understanding of the issues fails at the starting line if such information is concealed' • 'Greenwich's case is strengthened by the community's reliance on public/private sector partnerships to deliver affordable housing. There is a strong public interest in these developments succeeding and not being undermined, if indeed disclosure would undermine them given the interest of the developer in realising the value of assets.' |

| Document | Author | Significant Statements |
|---|--------|---|
| First-Tier Tribunal Decision Notice (Continued) | ICO | <ul style="list-style-type: none"> • 'the confusion which can be created by a lack of transparency in relation to Knight Dragon's application to vary the s106 agreement, with the openness of the borough wide assessment contrasting with the essentially close particulars of the BNP Paribas viability appraisal and Christopher Marsh review.' • 'One argument against disclosure of the redacted information was that those receiving it would be unlikely to understand it. In our experience this is never a useful objection to disclosure under FOIA or EIR. It is increasingly open to question whether the public should be expected to accept the "expert view" without opportunity to see the supporting factual evidence.' • 'the response on behalf of the requester was that he could have commissioned expert advice which would, according to their expert witness, be likely to expose the weakness, susceptibility to change over time, or other uncertainties apply to assumptions and values. This could be achieved in part through comparison with other models or information in the public domain [...] in our view further disclosure of detail would enrich the debate taking place on an issue agreed by all parties to be of considerable public importance.' • 'The objective of the EIR is to allow the public and in this case the affected community to have relevant factual information in time for them to participate effectively in environmental decision making. That intention is served by exposure of sufficient information to allow a fully informed interrogation of the recommendation.' |
| Freedom of Information Decision Notice | ICO | <ul style="list-style-type: none"> • 'The complainant told the Commissioner: "... we would like to see the full disclosure of claimed paragraph 6.0 within the financial viability report". The withheld information relates to the expected unit prices in £psf [...] on the plots where there is no affordable housing.' |
| Planning Board Minutes | RBG | <ul style="list-style-type: none"> • '[City Peninsular Residents' Association] 'residents believed that the current application was illegal because they were not consulted on the proposed variation.' • '[Greenwich Conservation Group] 'the Group was opposed to the proposal because it found it deplorable that no consultation had taken place on the application.' • 'The Member welcomed response in respect of the legal requirement to consult but stated that it was inexcusable that the Council had not taken a democratic approach to involve residents on matters that would impact on their local area and living conditions.' |

8.3 Document Review: 15/0716/O

Table 7 - References to viability and consultation (excerpted statements)

| Document | Author | Significant Statements |
|---|--------|--|
| Statement of Community Engagement [pre-application] | NLP | <ul style="list-style-type: none"> • [GLA consultation] 'The application needs to demonstrate that the maximum reasonable amount of affordable housing is delivered. A financial viability appraisal is required.' • 'The evolution of the scheme has also been informed by thorough community consultation involving both local organisations and residents.' • 'Engagement with the local community and local stakeholders groups has ensured that all views have been properly considered and taken into account' |
| Planning Report D&P/0519Q/01 | GLA | <ul style="list-style-type: none"> • 'given that the revised proposals represent more than a 50% increased provision in residential development [...] the GLA expects an increased provision in the quantity of affordable housing [...] further negotiation and discussion with the applicant and the Council is strongly encouraged with regards to this issue.' • 'The applicant will be required to demonstrate that any future planning application delivers the maximum reasonable amount of affordable housing. As part of this a financial viability appraisal will be required and this should be independently assessed on behalf to the council, with the results to be shared in full with GLA officers.' |
| Planning Report D&P/0519Q/02 | GLA | <ul style="list-style-type: none"> • 'Affordable housing is a vitally important part of the masterplan and it is therefore unacceptable for the development to attempt to seek planning permission and consult with details of affordable housing absent from the application. The viability information should be made fully publicly available and the details of the number, percentage and distribution of affordable housing should be made available for public consultation.' • [Greenwich Conservation Group] 'concerns were raised with a developer-led approach to the review and GCG believe it should be a Council-led approach. [...] The Group believed the developer-led approach weakens the Council's position when considering the Reserved Matters applications.' • [East Greenwich Residents Association] 'believed the consultation period to be inadequate and lacking detail and would expect that such a change to the original masterplan would undergo a more rigorous and transparent process' • [Joint response by Greenwich Society, Westcombe Society and East Greenwich Residents Association] 'advised that further sensitivity testing in the financial viability report is required by the Council's independent assessor' |

| Document | Author | Significant Statements |
|--|--------------------------------------|--|
| Planning Board - Officer Report | RBG | <ul style="list-style-type: none"> • [Joint response by Greenwich Society, Westcombe Society and East Greenwich Residents Association] 'The BNP/Paribas report does no more than claim that a wholly private development would make an inadequate profit. Such a scheme is not proposed nor would it be approved. No attempt is made to model a realistic scheme including affordable housing nor any sensitivity testing based on cost and selling price variables. Sensitivity testing is essential for a scheme with 20 year build period and they would expect RBG's independent assessor to require a more thorough approach.' • [East Greenwich Residents Association] 'EGRA also believe that there has been an inadequate period of consultation and that the consultation has lacked detail. The Association would expect such a significant change to the Masterplan to undergo a more rigorous and transparent process. The impact [...] should have been publicly debated with a much broader group of stakeholders and been independently assessed and reviewed'. • [Local residents, Neighbouring Properties and Businesses] Given the issues of the lack of openness and transparency on viability that have been exposed for the East Greenwich Peninsula Masterplan area, it is expected that any deviation from the Council's policy on affordable housing on the West Peninsula should require the viability report submitted by the developer and subsequent independent assessment be made fully available to both the members of the planning committee and wider public. Anything less would be received badly by the community and would no doubt lead to a further protracted and expensive EIR request which should be avoided for the sake of all involved.' |
| Development Viability Appraisal | BNP Paribas | <ul style="list-style-type: none"> • 'This report is provided to the Royal Borough of Greenwich on a confidential basis. We request that the report not be disclosed to any third parties'. |
| Planning Addendum: Consultation Responses [statutory consultation] | Nathaniel Lichfield & Partners (NLP) | <ul style="list-style-type: none"> • A Viability Assessment has been undertaken which demonstrates that a scheme with affordable housing is unviable. Nevertheless as stated in the application submission Knight Dragon commits to deliver affordable housing tenures in each district of the development.' • [The Charlton Society] 'A skimpy initial community consultation process.' • [Greenwich Conservation Group] 'We urge the Council to impose on the developer a definite affordable housing percentage [...] the Council will have more control of the situation and will be less at the mercy of the developer' |

8.4 Risk Assessment

RISK ASSESSMENT FORM FIELD / LOCATION WORK



The Approved Code of Practice - Management of Fieldwork should be referred to when completing this form

<http://www.ucl.ac.uk/estates/safetynet/guidance/fieldwork/acop.pdf>

DEPARTMENT/SECTION: BARTLETT SCHOOL OF PLANNING

LOCATION(S): LONDON

PERSONS COVERED BY THE RISK ASSESSMENT: Grace Hewett

BRIEF DESCRIPTION OF FIELDWORK:

Interviews with stakeholders exploring topic of viability appraisals.

Consider, in turn, each hazard (white on black). If **NO** hazard exists select **NO** and move to next hazard section.

If a hazard does exist select **YES** and assess the risks that could arise from that hazard in the risk assessment box.

Where risks are identified that are not adequately controlled they must be brought to the attention of your Departmental Management who should put temporary control measures in place or stop the work. Detail such risks in the final section.

ENVIRONMENT

The environment always represents a safety hazard. Use space below to identify and assess any risks associated with this hazard

e.g. location, climate, terrain, neighbourhood, in outside organizations, pollution, animals.

Examples of risk: adverse weather, illness, hypothermia, assault, getting lost.

Is the risk high / medium / low ?

Location: London

Adverse weather: low risk

Risk of assault: low risk

Conducting interviews within other establishments: low risk

CONTROL MEASURES

Indicate which procedures are in place to control the identified risk

- work abroad incorporates Foreign Office advice
- participants have been trained and given all necessary information
- only accredited centres are used for rural field work
- participants will wear appropriate clothing and footwear for the specified environment
- trained leaders accompany the trip
- refuge is available
- work in outside organisations is subject to their having satisfactory H&S procedures in place
- OTHER CONTROL MEASURES:** please specify any other control measures you have implemented:

Carry a mobile phone
 Avoid areas known to be 'unpleasant'
 Whilst on premises of other establishments, follow their safety guidance
 Keep to busy, well lit roads
 Plan your locations in advance

EMERGENCIES

Where emergencies may arise use space below to identify and assess any risks

e.g. fire, accidents Examples of risk: loss of property, loss of life

Loss of property: low risk
 Health accidents: low risk
 Risk of personal injury: low risk

CONTROL MEASURES

Indicate which procedures are in place to control the identified risk

- participants have registered with LOCATE at <http://www.fco.gov.uk/en/travel-and-living-abroad/>
- fire fighting equipment is carried on the trip and participants know how to use it
- contact numbers for emergency services are known to all participants
- participants have means of contacting emergency services
- participants have been trained and given all necessary information
- a plan for rescue has been formulated, all parties understand the procedure
- the plan for rescue /emergency has a reciprocal element
- OTHER CONTROL MEASURES: please specify any other control measures you have implemented:

Stop if feeling unwell
 Do not carry valuables

EQUIPMENT

Is equipment used?

NO

If 'No' move to next hazard
 If 'Yes' use space below to identify and assess any risks

e.g. clothing, outboard motors.

Examples of risk: inappropriate, failure, insufficient training to use or repair, injury. Is the risk high / medium / low ?

N/A

CONTROL MEASURES

Indicate which procedures are in place to control the identified risk

- the departmental written Arrangement for equipment is followed
- participants have been provided with any necessary equipment appropriate for the work
- all equipment has been inspected, before issue, by a competent person
- all users have been advised of correct use
- special equipment is only issued to persons trained in its use by a competent person

OTHER CONTROL MEASURES: please specify any other control measures you have implemented:

N/A

LONE WORKING

Is lone working
a possibility?

YES

If 'No' move to next hazard

If 'Yes' use space below to identify and
assess any
risks

*e.g. alone or in isolation
lone interviews.*

Examples of risk: difficult to summon help. Is the risk high / medium / low?

Lone interviews: low risk

Difficulties in summoning help when required: low risk

Dealing with other people - unexpected behaviour / personal attack: low risk

Causing offence: low risk

CONTROL MEASURES

Indicate which procedures are in place to control the identified risk

| | |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | the departmental written Arrangement for lone/out of hours working for field work is followed |
| <input type="checkbox"/> | lone or isolated working is not allowed |
| <input checked="" type="checkbox"/> | location, route and expected time of return of lone workers is logged daily before work commences |
| <input checked="" type="checkbox"/> | all workers have the means of raising an alarm in the event of an emergency, e.g. phone, flare, whistle |
| <input checked="" type="checkbox"/> | all workers are fully familiar with emergency procedures |
| <input checked="" type="checkbox"/> | OTHER CONTROL MEASURES: please specify any other control measures you have implemented: |

Leave details of locations with dates of departure and return with a colleagues at university prior to all interviews

Trust your intuition - if you feel uneasy, do not ignore it

Conduct interviews at neutral locations where neither party could be at risk

FIELDWORK 2

May 2019

ILL HEALTH

The possibility of ill health always represents a safety hazard. Use space below to identify and assess any risks associated with this Hazard.

*e.g. accident, illness,
personal attack,
special personal
considerations or
vulnerabilities.*

Examples of risk: injury, asthma, allergies. Is the risk high / medium / low?

Risk of personal injury / health accidents: low risk

Health accidents to interviewees: low risk

Medical conditions resulting from extended display screen use: low risk

CONTROL MEASURES

Indicate which procedures are in place to control the identified risk

| | |
|--------------------------|---|
| <input type="checkbox"/> | an appropriate number of trained first-aiders and first aid kits are present on the field trip |
| <input type="checkbox"/> | all participants have had the necessary inoculations/ carry appropriate prophylactics |
| <input type="checkbox"/> | participants have been advised of the physical demands of the trip and are deemed to be physically suited |

| | |
|--|---|
| | participants have been adequate advice on harmful plants, animals and substances they may encounter |
|--|---|

| | |
|--|---|
| | participants who require medication have advised the leader of this and carry sufficient medication for their needs |
|--|---|

| | |
|---|---|
| x | OTHER CONTROL MEASURES: please specify any other control measures you have implemented: |
|---|---|

If you feel unwell - stop

Be aware of where medical supplies or treatment can be received if an accident occurs

To control for fatigue and stress, ensure postural and visual problems are dealt with and take sufficient breaks

| | | | | |
|------------------|-------------------|-----|---|--|
| TRANSPORT | Will transport be | NO | | Move to next hazard |
| | required | YES | x | Use space below to identify and assess any risks |

e.g. hired vehicles

Examples of risk: accidents arising from lack of maintenance, suitability or training

Is the risk high / medium / low?

Use of public transport: low risk

| | |
|-------------------------|---|
| CONTROL MEASURES | Indicate which procedures are in place to control the identified risk |
|-------------------------|---|

| | |
|---|---|
| x | only public transport will be used |
| | the vehicle will be hired from a reputable supplier |
| | transport must be properly maintained in compliance with relevant national regulations |
| | drivers comply with UCL Policy on Drivers http://www.ucl.ac.uk/hr/docs/college_drivers.php |
| | drivers have been trained and hold the appropriate licence |
| | there will be more than one driver to prevent driver/operator fatigue, and there will be adequate rest periods |
| | sufficient spare parts carried to meet foreseeable emergencies |
| x | OTHER CONTROL MEASURES: please specify any other control measures you have implemented: |

Plan your journey in advance.

| | | | |
|--------------------------------|---------------------|-----|---|
| DEALING WITH THE PUBLIC | Will people be | YES | If 'No' move to next hazard |
| | dealing with public | | If 'Yes' use space below to identify and assess any risks |

e.g. interviews, observing

Examples of risk: personal attack, causing offence, being misinterpreted. Is the risk high / medium / low?

Personal attack: low risk

Unexpected behaviour: low risk

Being misinterpreted: low risk

CONTROL MEASURES

Indicate which procedures are in place to control the identified risk

| | |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | all participants are trained in interviewing techniques |
| <input type="checkbox"/> | interviews are contracted out to a third party |
| <input type="checkbox"/> | advice and support from local groups has been sought |
| <input checked="" type="checkbox"/> | participants do not wear clothes that might cause offence or attract unwanted attention |
| <input checked="" type="checkbox"/> | interviews are conducted at neutral locations or where neither party could be at risk |
| <input type="checkbox"/> | OTHER CONTROL MEASURES: please specify any other control measures you have implemented: |

Be aware of any delicate issues involved with interviews and explain to all interviewees who you are, the purpose of the research and ensure anonymity of data
 Conduct interviews at neutral locations where neither party could be at risk
 Always carry your UCL ID card and be prepared to identify yourself
 Do not be enticed into an argument

FIELDWORK

3

May 2019

WORKING ON OR

Will people work on

NO

If 'No' move to next hazard

NEAR WATER

or near water?

If 'Yes' use space below to identify and assess any risks

e.g. rivers, marshland, sea.

Examples of risk: drowning, malaria, hepatitis A, parasites. Is the risk high / medium / low?

N/A

CONTROL MEASURES

Indicate which procedures are in place to control the identified risk

| | |
|--------------------------|--|
| <input type="checkbox"/> | lone working on or near water will not be allowed |
| <input type="checkbox"/> | coastguard information is understood; all work takes place outside those times when tides could prove a threat |
| <input type="checkbox"/> | all participants are competent swimmers |
| <input type="checkbox"/> | participants always wear adequate protective equipment, e.g. buoyancy aids, wellingtons |
| <input type="checkbox"/> | boat is operated by a competent person |
| <input type="checkbox"/> | all boats are equipped with an alternative means of propulsion e.g. oars |
| <input type="checkbox"/> | participants have received any appropriate inoculations |
| <input type="checkbox"/> | OTHER CONTROL MEASURES: please specify any other control measures you have implemented: |

N/A

MANUAL HANDLING (MH)

Do MH activities take place?

NO

If 'No' move to next hazard

If 'Yes' use space below to identify and assess any

| risks | |
|--|--|
| <i>e.g. lifting, carrying, moving large or heavy equipment, physical unsuitability for the task.</i> | Examples of risk: strain, cuts, broken bones. Is the risk high / medium / low? N/A |
| CONTROL MEASURES | Indicate which procedures are in place to control the identified risk |
| <input type="checkbox"/> | the departmental written Arrangement for MH is followed |
| <input type="checkbox"/> | the supervisor has attended a MH risk assessment course |
| <input type="checkbox"/> | all tasks are within reasonable limits, persons physically unsuited to the MH task are prohibited from such activities |
| <input type="checkbox"/> | all persons performing MH tasks are adequately trained |
| <input type="checkbox"/> | equipment components will be assembled on site |
| <input type="checkbox"/> | any MH task outside the competence of staff will be done by contractors |
| <input type="checkbox"/> | OTHER CONTROL MEASURES: please specify any other control measures you have implemented: |
| | N/A |
| FIELDWORK | 4 |
| May 2019 | |

| SUBSTANCES | Will participants work with substances | NO | If 'No' move to next hazard If 'Yes' use space below to identify and assess any risks |
|--|---|-----------|---|
| <i>e.g. plants, chemical, biohazard, waste</i> | | | Examples of risk: ill health - poisoning, infection, illness, burns, cuts. Is the risk high / medium / low? |
| | | | N/A |
| CONTROL MEASURES | Indicate which procedures are in place to control the identified risk | | |
| <input type="checkbox"/> | the departmental written Arrangements for dealing with hazardous substances and waste are followed | | |
| <input type="checkbox"/> | all participants are given information, training and protective equipment for hazardous substances they may encounter | | |
| <input type="checkbox"/> | participants who have allergies have advised the leader of this and carry sufficient medication for their needs | | |
| <input type="checkbox"/> | waste is disposed of in a responsible manner | | |
| <input type="checkbox"/> | suitable containers are provided for hazardous waste | | |

OTHER CONTROL MEASURES: please specify any other control measures you have implemented:

N/A

OTHER HAZARDS

Have you identified any other hazards?

NO

If 'No' move to next section

If 'Yes' use space below to identify and assess any risks

i.e. any other hazards must be noted and assessed here.

Hazard:

Risk: is the risk

CONTROL MEASURES

Give details of control measures in place to control the identified risks

N/A

Have you identified any risks that are not adequately controlled?

NO

Move to Declaration

YES

Use space below to identify the risk and what action was taken

N/A

Is this project subject to the UCL requirements on the ethics of Non-NHS Human Research?

If yes, please state your Project ID Number

For more information, please refer to: <http://ethics.grad.ucl.ac.uk/>

DECLARATION

The work will be reassessed whenever there is a significant change and at least annually. Those participating in the work have read the assessment.

Select the appropriate statement:

I the undersigned have assessed the activity and associated risks and declare that there is no significant residual risk

I the undersigned have assessed the activity and associated risks and declare that the risk will be controlled by the method(s) listed above

NAME OF SUPERVISOR: Dr Enora Robin

SIGNATURE: *SUPERVISOR APPROVAL CONFIRMED VIA EMAIL*

DATE: 02/07/2019

FIELDWORK 5

May 2019