

# BPLN0039\_SKZN3

*by* Edward Adams-Felton

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**Submission date:** 04-Sep-2022 04:06PM (UTC+0100)

**Submission ID:** 185677540

**File name:** BPLN0039\_SKZN3\_3828312\_993559388.pdf (745.26K)

**Word count:** 14635

**Character count:** 81367

University College London  
Faculty of the Built Environment  
The Bartlett School of Planning

**A review of environmental planning policy and the post-political –  
the case study of the Urban Greening Factor**

**SZKN3**

**Date: 05/09/2022**

	Word count
Main body of dissertation	10206
Appendices	3412

Being a dissertation submitted to the faculty of The Built Environment as part of the requirements for the award of *MSc Urban Design and City 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.

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## 1. Abstract

The post-political concept has, nominally, very high explanatory value. It neatly and plausibly ascribes a raft of structural and governance changes in urban policymaking in recent years to a neoliberal consensus that forecloses dissent and public engagement. However, the definition of the 'political' the concept relies upon and the lack of empirical observation of the theory have led to criticism. In choosing a case study which, at face value, represents a typecast 'post-political' policy (London's Urban Greening Factor), this study challenges the concept. Building an analytical framework that establishes three key dimensions of the post-political, the study operationalises the concept through interviews with built environment professionals, directly bridging the gap between theory and practice.

## 2. Introduction

The post-political concept, applied to cities by Swyngedouw (Beveridge & Koch, 2017) argues that urban political life is being suppressed in favour of a consensus-based, neo-liberal restructuring of policy and governance. Swyngedouw (2007a, 2007b, 2009) argues that a *proper political process* allows for the expression of dissent and the space for dissent to transform into the police order (the activities which make up a political system). Swyngedouw's *proper political process*, as defined in this study, is then used to reflect on the reasons why this process may not be happening and whether it is an appropriate tool for understanding urban governance and policy.

The key elements of this reflection centres on environmental policy, which, arguably, typifies the post-political concept (Swyngedouw, 2009). Via the narrative of impending environmental catastrophe, the police order (urban governance system) has shaped itself around a scientific consensus of climate disaster. In doing so, it forecloses the alternative ideas and challenging concepts that could arise, in favour of pursuing a return to a 'nature' of the past which no longer exists.

To examine these contentious ideas, three dimensions of the post-political concept are identified in the literature review; the motivations (why it seems to be occurring), the tools (how it is being manifested) and the outcomes (what it means in practice). These dimensions later form the analytical framework from which the findings are drawn.

Despite the "broad brush potency" (Beveridge & Koch, 2017, p32) of the post-political concept, there are distinct critiques (Beveridge & Koch, 2017; Lord & Tewdwr Jones, 2021; Metzger et. al., 2021). The concept employs an extremely strict definition of the political that reduces positive action to "heroic", radical forms of dissent (Beveridge & Koch, 2017, p36). Furthermore, this definition pulls a majority of politics and political activity into a "trap" in which it exists on an analytical plane apart from the elevated dissent of Swyngedouw's 'political'. The rare, radical moments are of value and the mundane everyday politics is not. As such, the majority of politics is irrelevant. The broad theoretical assumptions of the concept are reflected in a lack of empirical observation of the concept at work. The analytical framework and the three dimensions of the post-political concept aim to identify these empirical examples.

In order to empirically identify the post-political concept at work, a case study has been selected, the Urban Greening Factor (UGF) policy introduced in the 2021 London Plan by the Greater London Authority (GLA) (2021a). As a quantitative target for urban greening, the policy reflects the environmental subject matter that typifies Swyngedouw's concept (2009) as well as typifying one of the tools of the post-political - technologies of performance. The tool allows for the bypassing of political action by allowing private interests to self-assess performance against pre-determined benchmarks (Dean cited by Swyngedouw, 2007a, p8). Doing so forecloses alternative options and thought, instead defining a target and the actors responsible for achieving it.

To see if this theoretically 'post-political' benchmarking tool can be proved as such, two methods of analysis have been selected for this study. Firstly, a review of the key policy documents; namely the London Plan (GLA, 2021a) in which the policy was set out, the draft policy guidance document (GLA, 2021b) and the consultation questionnaire produced to source public opinion in the policy (GLA, 2021c). These documents can loosely be mapped to the analytical framework with the London Plan representing the potentially 'post-political' motivations of the policy, the guidance articulating how the tool works and the questionnaire providing clues as to the concerns of the policy's creators about the outcomes it generates.

The second method of analysis is a series of semi-structured interviews with built environment professionals experienced in using the UGF policy. Building on the policy analysis, interview questions were again shaped around the analytical framework and were designed to test Swyngedouw's (2007a, 2007b, 2009) post-political theory in an operational setting.

### 3. Literature Review

#### 3.1. *The Post-Political Concept*

Swyngedouw is widely credited for applying the concept of the post-political to the city (Beveridge & Koch, 2017). Drawn from critiques of cynical radicalism, Swyngedouw (2007a) argues that the city has been de-politicised in favour of a neo-liberal, populist consensus that quells debate and dissent. To understand this argument, we must first look to Swyngedouw's definition of the political which is drawn from Ranciere (cited by Swyngedouw, 2009). Ranciere distinguishes 'the police', 'the political' and 'politics' from one another. The 'police' or 'police order' is defined as "all the activities which create order by distributing places, names, functions" (Ranciere cited by Swyngedouw 2007a, p16). It represents the dominant systems and apparatus of governance and society. 'Politics' is the successful rupturing of the police order in response to 'the political' – the expression of dissent and demand for change from those not empowered by the police order (Swyngedouw, 2007b).

Through Swyngedouw's (2009) use of these definitions, the following cycle can be argued to be the epitome of a functioning political city. The police order sets the policy agenda. When this policy agenda inevitably excludes a group, that group expresses their dissent to the policy – they act 'politically'. This expression should eventually turn into 'politics' at the moment at which the police order is disrupted. On disruption, a new 'police order' is formed and the iterative cycle starts again.

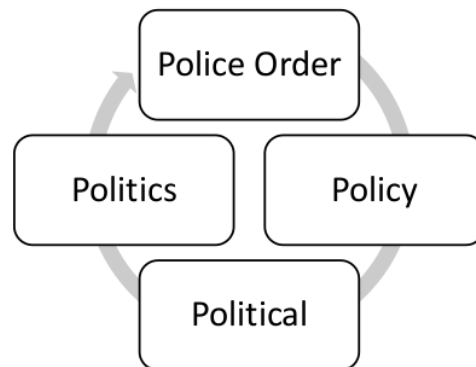


Figure 1: 'Proper political process' as deduced from Swyngedouw (2009)

When this cycle is not functioning and there is no room for the 'political' to disrupt the police order, a consensus is drawn over the policymaking agenda by the police order. This consensual outcome leads to the permanent exclusion of groups not benefitting from the policy direction, a policy



direction which is unlikely to change without room for the 'political' to change it. Swyngedouw (2009, p602-603) cites the quadrupling of oil prices in 2008 as a prime example of the outcomes of the post-political. Whilst the government and environmentalists perceived an opportunity to reduce the strategic risk of fossil fuel dependence, the subsequent policymaking that saw "food crops replaced by bio-fuels, access to energy curtailed and the cost of moving around going up" (Swyngedouw, 2009, p602) disproportionately affects lower income groups who are not within the police order or heard in the 'post-political' system. This led to large scale riots in urban areas globally.

In summation, the key outcome of this 'post-political' order is the consensus that no alternative world order is possible other than the neoliberal incumbent. This has resulted in the growth of managerial and technological apparatuses of government growing that stage manage the otherwise inevitable urban decline (whether social, economic or environmental). Dissent and conflict against this prevailing view is marginalised as traditionalist when based on a refusal of the world order (and its progress and modernity) or fundamentalist when reflecting on the virtues (or lack of) of other methods of governance (Swyngedouw 2007a, p12).

Swyngedouw (2007) does postulate that the ideal political process in fig. 1 has been broken and that the consensual outcomes in contemporary western policymaking are due to the rise of neoliberalism and the subsequent shifts it has introduced to the police order and urban governance systems. The concept of neoliberalism must therefore be defined in order to understand the impact of this philosophy on the *proper political process* as outlined above. Although a highly contestable topic – Storper (2016) provides an excellent critical account of the historical development and use of the concept – neoliberal thinking is a focus on "economic rationality, involving a reworking of 'public considerations and private interests, which it accomplishes, in part, by collapsing public issues into the realm of the private'" (Giroux, 2004, cited in Allmendinger & Haughton, 2012, p92). Given the language ('collapsing') we can assume that this definition is not unbiased toward the concept and it is shared by Swyngedouw. His neoliberal police order confines dissent by moving power from the state to:

- private companies (privatisation/de-regulation)
- higher levels of government (e.g. European Union)
- localised multi-agency governance groups

Consequently, Swyngedouw (2007a, 2007b, 2009) labels this 'governance-beyond-the-state' where the role of allocating resources is diverted away from the traditional conception of government.

Swyngedouw cites urban environmental policymaking as a prime example of the 'post-political' city and this 'governance-beyond-the-state' (2007a, 2007b, 2009). The urban environmental police order legitimises de-politicisation by appealing to a scientific consensus of inevitable environmental catastrophe:

*"leaders and politicians keep on spreading apocalyptic and dystopian messages about the clear and present danger of pending environmental catastrophes that will be unleashed if we refrain from immediate and determined action."* (Swyngedouw, 2007b, p16)

Whilst this apocalyptic scenario is widely accepted to be true, the resultant focus on managerial, technocratic responses that prioritises resolutions over inclusion foreclose a number of alternate realities that spring from radical dissent that, unless voiced, may never have the opportunity to resolve our urban ills.

Swyngedouw (2009, p611) argues that these managerial and technocratic responses to catastrophe hark back to some harmonious former state of nature that can theoretically be reproduced. This position relies on normative choices as to which 'natures' we keep and which we aim to eradicate. Some 'natures' (like infectious diseases) we aim to engineer out, yet others we try to retain (through processes like rewilding). The police order sets out the managerial approaches for this choreography which may be argued over or shifted. However the original "dictum" remains unchallenged, reinforced by the ever more impending environmental catastrophe (Swyngedouw, 2009, p611).

Raco (2015) labels this narrowing of the options for change within the policy arena as the 'politics of the possible'. He argues that 'delivery' or the outputs that policies generate have become the key concern of the police order. However, in the wider sustainability context, Raco (2015, p125) attributes this to 'a growing frustration' at the lack of outcomes delivered by sustainability programmes in general rather than a dire need to solve an ever-increasing threat. Instead of driving for systemic change, which hasn't been working, the police order has settled for securing achievable sustainable outcomes by:

- breaking sustainability programmes into small, do-able projects to ensure progress (of some sort) is made;
- focusing on project management to expedite progress;
- sourcing expertise from the private sector through contractual arrangements as a means of delivering rigid, specific goals; and
- marginalising engagement to limit disruptions to projects (Raco, 2015, p125-126).

These four principals again suggest that the *proper political process* is being blurred by the motivations and make up of the police order.

Allmendinger & Haughton (2012) apply a more empirical analysis of a similar phenomenon to urban planning in England. They argue that New Labour's shift to 'spatial planning' in the early 2000s was a materialisation of the party's ideology, bringing economic globalisation and foci on justice and social inclusion into the planning fold. Focus was shifted to delivery of housing in particular, through the mobilisation of "acquiescence for policies and strategies that favour certain groups or interests" (Allmendinger & Haughton, 2012, p93). Participation was front loaded to plan-making stages to favour the haste of development processes by reducing the impact of consultation at planning application stage.

Many of the 'post-political' policies that New Labour and subsequent governments shifted toward can be categorised as technologies of performance (Dean cited by Swyngedouw, 2007a, p8). These include the use of benchmarking rules that provide the parameters for decision-making outside the direct influence of the state or of the citizen – agreed principles that have been pre-ordained for use in the planning process.

Swyngedouw (2009), Raco (2015) and Allmendinger & Haughton (2012), have all highlighted how different motivations (ideology, catastrophe and progress), have led to a 'post-political' style shift of the traditional police order. Private companies have taken on a greater role and citizens, a diminished one. Furthermore, they have flagged a number of tools of de-politicisation, the full list of which can be found in appendix 1. A synthesised list of these tools can be found below.

Table 1: Synthesised list of tools of de-politicisation

Synthesised De-politicisation Tool	Tool Operationalised
Privatisation	Shifting emphasis away from citizen and state toward private companies through de-regulation and commissioning reducing the impact of the 'political'.
Shifting levels of governance	Shifting emphasis away from the traditional state to broader or more localised institutions (e.g. European or local government)
Compartmentalised policy making	Reduction of holistic ideological change to manageable parts by disconnecting them from the whole. Discourages 'political' thought by foreclosing new ways of thinking about the police order.
Engagement as disruption	Technocratic focus on decision-making produces a 'right' outcome based on objective, technocratic truth. Engagement with citizens clouds this 'truth' and is therefore side-lined or seen as a necessary evil where the outputs are not included in the policy agenda. This forecloses any feedback or incorporation of political expression.
Technologies of performance - benchmarking	Imposition of state-backed parameters and targets to allow actors to self-assess performance excluding the need for political interruption.

Across Raco (2015) and Swyngedouw's (2007a) works, neoliberal style shifts to the private sector are common factors. A move away from traditional government to other forms of public sector governance is another identifiable theme which is particularly pertinent to this study given the nature of the Greater London Authority (GLA) and its policy agenda. Technologies of performance too are heavily applicable to the UGF benchmarking tool. Finally, Raco's (2015) tools of compartmentalised policymaking and engagement as disruption also provide interesting reflections on the London Plan as a suite of policies that is consulted on during plan-making stage.

In summary, this literature review has identified three key dimensions of the post-political concept:

- Motivations – why post-politics is occurring and its justifications (e.g. neoliberal ideology, catastrophe, progress)
- Tools – how post-politics is manifested by the police order (e.g. privatisation)
- Outcomes – the effects of post-politics in action (e.g. exclusion of groups and views by dominant consensual policy direction)

Together, they form a framework from which the analytical findings of this research can be drawn.

### 3.2 Critiques of the Post-Political Concept

Whilst critics may agree that some of the tools above are features of the contemporary political arena, they nonetheless enable critique of post-political theory. In their analysis, Beveridge & Koch (2017, p32) praise the “broad brush potency” of the post-political concept. Indeed, above we have seen that it is relatively easy to identify theoretical and empirical motivations for the neoliberal shift Swyngedouw (2007a, 2007b, 2009) describes and to detect the tools that are used to generate these shifts. However, they also point to some of the inadequacies and over-simplifications it employs. Beveridge & Koch (2017) argue that by strictly differentiating between the ‘political’ and ‘politics’, you are in essence creating a ‘trap’ where this is nothing to study at all. If the ‘political’ is a sudden moment of purity that cannot be institutionalised or captured, then it does not belong on an analytical level with ‘politics’ – the everyday elections, disagreements and organisations that make up the police order. The ‘political’ is a rare, almost philosophical entity according to Ranciere (cited by Swyngedouw, 2009) yet, is the only thing that generates real change. As such, on an empirical level, politics will always be deficient in comparison to the elusive pure political moment. This leads to a situation where there is nothing (or very little) to empirically analyse.

This analytical ‘trap’ and the resultant lack of empirical study of the concept provides the research gap that this study addresses. Beveridge & Koch (2017, p37) identify the problem, labelling post-political theory as a “field of urban research dominated by theoretical assertions, lacking in empirical research”. Due to the analytical plane on which the post-political concept lies, there is a lack of empirical research on the topic (Lord & Tewdwr-Jones, 2018, p232).

Furthermore, the operational outcome of this definitional stance is that political agency becomes either “heroic or anti-heroic” (Beveridge & Koch, 2017, p36). Whilst ‘polemic’ acts like the ‘Occupy’ movement can and do occur, the day-to-day processes are marginalised. In reality, there are plenty of actors at work within the realms of politics and the police order who enact change for citizens, all of which cannot be analysed using a ‘post-political’ framework if only this strict definition of the ‘political’ is considered.

Instead of this narrow conception of the ‘political’, Metzger et. al (2021) argue that there is a role for ideology in the post-foundational theory. Whilst the post-political concept asserts that the police

order and the people in it are merely cogs in a metaphorical neoliberal machine, churning out an ever more unimaginative set of policies that toe the line, many have suggested that a wider view of political agency should be taken (Beveridge & Koch, 2017; Lord & Tewdwr-Jones, 2018). Salet (cited by Metzger et. al, 2021, p302) argues that planners as professionals “work towards developing practical solutions for problems in concrete situations”. However, this allegedly ideology-free purpose is in fact value laden in its reference to pursuing utility. Therefore, Metzger et al. (2021, p302-303) argue that in pursuing their practical solutions to problems, planners are in fact reproducing socially produced ideologies. Whilst this of course does not disprove the ‘post-political’ neoliberal hegemony, it does suggest that political agency is shaped by more than the dramatic, paradox-shifting moments of the ‘political’. This assuages concerns that the ‘post-political’ label is a consensus that has been established free of politics (Lord & Tewdwr-Jones, 2018, p232).

If we accept then that ideology affects the everyday actions of decision-makers and as such, is an influence unaccounted for in the *proper political process* outlined in fig. 1, then the term ideology must be defined to the same degree as the other elements of the cycle. Again, ideology is a “slippery social scientific concept” (Metzger et. al, 2021, p304). Laclau’s definition (cited by Metzger et. al, 2021) is a post-foundational approach which argues that ideology:

*“denote[s] discourse that serves to stabilize society by providing the grounds on which social collectivity can be constructed temporarily by ‘suturing’ the fundamental conflict lines that inevitably exist in any given social collectivity.”* (Metzger et. al, 2021, p305).

Ideology therefore can be considered a consensus that brings disparate groups and interests together in a unified political force.

Referring back to post-political theory, and specifically the focus on sustainability as an example of the ‘post-political’ city in action, we can see an alternative viewpoint through the lens of ideology. Where Swyngedouw and colleagues see a consensus around loosely defined concepts such as ‘sustainable development’ and a subsequent foreclosure of original thought altering the system of governance - the ‘political’, the ideology based consensus sees a banner for rallying disparate actors and agencies into a workable coalition. These two concepts observe the same outcome – policy making around a central, consensual, theme. ‘Post-political’ theorists see it as a means by which an elite can secure their goals and long-term security where others observe the end of a positive political process (ideology) that has quilted over the ruptures and conflicts within society.

For the purposes of this study, the role of 'sustainability' must be examined. Does it represent a 'post-political' tool of the neoliberal hegemony or does it represent an ideology in and of itself – a conglomeration of our collective concern about the impact of cities on the environment? Specifically in terms of the UGF, is this benchmarking tool designed for conversations between planners and developers symptomatic of a neoliberal shift or just one tool in a suite of tools designed to further the sustainability ideology?

### *3.3 The Urban Greening Factor (UGF)*

Environmental assessment tools have grown in popularity in conjunction with the increasing interest in the sustainability of our cities in recent years (Haapio, 2012). Greening factor tools have been a key part of this, emerging across many cities globally including Seattle, Berlin, Helsinki and Southampton under various names and guises (Juhola, 2018, p254). These tools purportedly provide a lens through which to examine the proportion of green infrastructure in the built environment. Although widely adopted, there are questions over their efficacy and crucially in terms of the post-political concept, over "who can participate in the use of the tools and whose views are taken into consideration" (Juhola, 2018, p255). There is also a lack of academic research into the practical experiences of developing and applying these tools (Stenning cited by Juhola, 2018, p254). These concerns are why this policy may be considered 'post-political' and why it has been chosen to be reviewed from an operational perspective in this study.

There a number of challenges with environmental assessment tools and greening factor approaches in particular that may be of relevance to the post-political discussion. Ameen et al. (2018, p115) provide example of assessment tools (such as LEED-ND) that are designed with the intention of "pushing the limits of market recognition for sustainability through assessment". Indeed, Riviera (cited by Haapio, 2012, p167) asserts that assessment tools bring "measurable publicity and exposure for developer[s]". These reflections indicate that rather than being environmentally motivated, these tools are designed as a transparent manipulation of the market, designed to encourage private interests into competitively differentiating their projects from others. This is a whole-hearted shift of the urban environmental policy agenda towards a neoliberal hegemony as change only comes through the strict parameters of the market.

Baycan-Levent & Nijkamp (2009, p1) identify a series of economic benefits of urban greening alongside the social and ecological benefits. Most pertinently they highlight that urban greening raises property values. This reinforces the link between environmental assessment tools (and greening factor tools particular) and market interests. Greening factor tools link the value of the majority market-owned assets of the city to policy and government ensuring a mutually beneficial cycle of wealth. However, considering the environmental assessment tools solely in this way, particularly with the raft of social and ecological benefits Baycan-Levent & Nijkamp (2009) highlighted, would be to disregard the genuine intention of their design.

The problem of public participation pushes greening factor tools further into the post-political conceptual wheelhouse. In reviewing urban greening and public participation technologies respectively, Baycant-Levant & Nijkaamp (2009) and Bugs et. al (2009) found civil participation to be a key indicator of successful green spaces in urban areas.

*“Undoubtedly, key players in urban planning are the inhabitants, who know the reality and the problems around them better than anyone else. Citizens’ knowledge provides a rich source of updated information that helps to improve the quality of the analysis, leading to different solutions than when using traditional forms of data.”* (Bugs et. al, p172)

This viewpoint lies in stark contrast to the potential side-lining of engagement in a ‘post-political’ world. This suggests that greening factor policies, particularly those designed as tools for developers and planners rather than citizens, may be considered ‘post-political’ policies.



## 4 Research Methods

### 4.1 Analytical Framework & Structure

The research gap that this paper addresses is the lack of empirical analysis and observation of post-political theory in action. In order to do this, this study constructs an analytical framework to operationalise the theory. An analytical framework outlines “the key elements a study is to consider, as well as the relationship of these elements to one another” (Ostrom cited by Carol & Bokelmann, 2017, p1), allowing for a deeper understanding of the whole.

The literature review outlines a *proper political process* in the form of a cycle (fig. 1) which is directly drawn from the theory of a ‘post-political’ city – reverse engineering an ideal situation in contrast to the perceived negative. However, Metzger et. al (2021, p309) highlight that “ideology dynamics do not tend to present themselves at face value... [when drawn from] complex and entangled practices”. As such, a more empirical root to this theoretical essence has been identified. Below, the three more perceivable dimensions of post-political theory as identified in the literature review are presented;

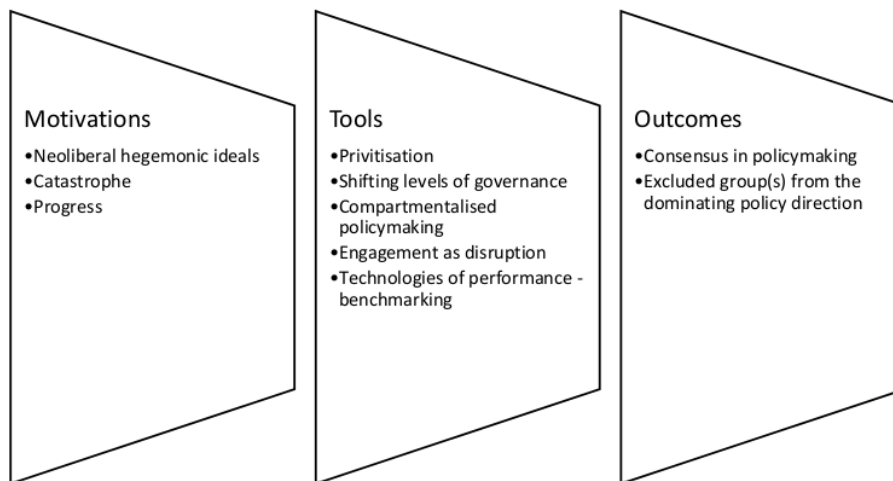


Figure 2: The post-political analytical framework

As depicted, they can be viewed as different layers that form a framework for understanding the ‘post-political’ city. The motivations set the ‘post-political’ agenda, the tools pursue the established agenda and the outcomes (in theory) are the materialisation of this agenda. This framework is essentially the antithesis of the *proper political process* as outlined in fig. 1. As such, the framework

focuses on the neoliberal hegemony of the police order as argued by Swyngedouw (2009). However, the motivations and tools could be different if another consensus established by a strict state-led economy was driving the post-political process for example.

These dimensions and their constituent characteristics are a simplified means by which a case study can be compared to the typical aspects of the post-political process. The framework is not as scientific as to demand that a case study must meet all of the characteristics within each dimension. Indeed, the concept is subjective and therefore proof of the post-political will not be identified categorically. However, similarities with the characteristics identified would lend weight to the post-political theory via an empirical observation of its key tenets.

To empirically observe post-politics in action, our case study, the UGF, must be analysed against this framework (fig. 2). We must analyse how and why the UGF policy came to be (the motivations for setting it up), whether it could be considered to match one or more of the typical types of tools used by the police order in the 'post-political' city, and whether the culmination of these generates post-political outcomes. To do this, a combination of policy analysis and interviews will be used. The outcomes from which will then be reflected on in turn from the perspectives of each dimension of the post-political as set out in the literature review.

#### 4.2 Policy Analysis

The policy analysis is the logical beginning of the findings. This section forms a foundation of observations about the policy; why it was introduced (motivation), its resemblance to the tools of the post-political and the outcomes it aims to produce (reflecting the framework and the three dimensions of the post-political concept). This qualitative reflection will tell us how the policy is presented and its intention, which can then be compared to interviewees perceptions of the policy in practice.

The following policy documents have been selected as the primary data sources for this section of analysis:

*Table 2: Policy documents and their contribution to the analysis*

<b>Policy Document</b>	<b>Contribution to analysis</b>
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The London Plan (March 2021)	The London Plan is the GLA's overarching spatial strategy. By including the UGF within the plan, the regional authority is directly shaping the type of policy across London. The plan then is the effective starting point of the policy and where the 'motivations' of the policy are most likely to be found.
London Plan Guidance – Urban Greening Factor (Consultation Draft September 2021)	The UGF guidance is the detailed supplement to the London Plan outlining how the UGF should be operationalised by practitioners and adopted by the London boroughs. As such, this document is likely to articulate the 'tools' of the policy.
Urban Greening Factor Guidance – GLA Engagement Portal Questionnaire	The Engagement Questionnaire constitutes the GLA's public-facing consultation for the policy. Analysis here should indicate any 'outcomes' the policy may create or look to mitigate.

Each of the policy documents has been identified as it lends itself to one of the dimensions of the post-political (and is of course a key policy document). They will also allude to the other dimensions and will be analysed as such. This will begin the process of operationalising the theoretical by applying a normative concept to tangible policy whilst supporting the analytical themes that will be tested in the interviews with practitioners.

#### 4.3 Data Collection - Interviews

To complete the analysis, the assumptions established in the policy analysis will be used to test whether the UGF, and by extension environmental planning policy of this type, can be considered the epitome of 'post-political' policy. A series of interviews were undertaken with planning, development and design practitioners to understand their views of the UGF, why and how it has been implemented in their immediate contexts and the impact(s) it has had. Again, the three dimensions in the framework above will be used to frame findings and to review the concept and the policy.

Due to the clear focus of the research on the UGF case study, semi-structured qualitative interviews will be the primary method of data collection. The questions for the structured element of the interviews have been derived from the literature review and the analytical framework established above (fig. 2) and can be found in the appendices (appendix 2). They are focused around the three dimensions of the 'post-political' city; the motivations, tools and outcomes of the post-political. The questions will be used as prompts by the interviewer and adapted to the interviewee and

conversation. Pertinent points raised by interviewees, will also be explored further through ad-hoc questioning framed by the established analytical landscape.

Interviewees were selected from the researcher's professional network. Professionals that have had recent experience working on schemes that have been required to prepare UGF assessments have been chosen with a particular focus on those within landscaping specialisms. This is to ensure that interviewees have the greatest knowledge of the UGF, its processes and implications.

Five interviews were conducted with each interview taking approximately 30 mins. An additional 10 minutes was scheduled for each interview to allow for the participant information sheet to be read before beginning the questions began, and to allow for any questions about the study both before and after the interview. Given the prevalence of remote video meeting software in a post-Covid professional context, interviews were conducted via Microsoft Teams. This allows interviewees to participate in the study with the least amount of inconvenience. This also allows interviews to be recorded and transcribed automatically, reducing the resource demand on the researcher.

#### 4.4 Research Ethics

This research proposal presents a low ethical risk to participants. To ensure interviews were undertaken in an ethical manner, participants were provided with an information sheet prior to joining the study that outlines the objectives of the research (Appendix 3). After reading the information, participants were asked to confirm their agreement to the terms set out in the information sheet and were given time to ask any questions.

The information sheet noted that participants could leave the interview/research process at any point in proceedings and may request that any or all of their interview data be excluded from the study. The interviews themselves were conducted in an open and fair manner and responses were anonymised with professional titles excluded to ensure anonymity. Recordings and transcriptions of the files were taken and saved in a password-encrypted folder with each file named with a unique identifier to ensure data security and anonymity. On submission of this paper (5<sup>th</sup> September 2022), recordings and transcriptions were permanently deleted.

Anonymity is extremely important to this study. Participants were supported to be as comfortable as possible in disclosing their honest thoughts about the policy irrespective of their professional roles and allegiances. As such, specific scheme examples are excluded from the findings as they could easily be used to attribute comments to the relatively few landscaping professionals involved in an individual scheme's UGF submission.

#### 4.5 Limitations

There are limitations to this methodology. The UGF as a case study limits the applicability of the empirical findings given the small sample size of one policy within the significant breadth of environmental planning policy as a whole that it represents. However, it does offer a methodology that can enable a greater empirical scrutiny on the post-political concept and potentially 'post-political' policymaking. This study, and others like it, may be able to dispel post-politics as a broad-brush concept which is insufficiently nuanced to be practicable as Beveridge & Koch (2017, p32) argue, or the empirical findings may add to this critique of policy bringing about the sort of structural change that Swyngedouw (2007a, 2007b, 2009) calls for.

This limitation also has a geographical component. The case study is a London-wide policy. This means only the GLA's implementation of the UGF is analysed. Other cities like Seattle, Berlin, Helsinki and Southampton have all implemented greening factors and these are not within the scope of the study. Further research could look at the variances in how greening factors are applied across different cities and the effect that has when comparing to the dimensions of the post-political established in this study.

The geographical scope of the study should also be acknowledged as it means professionals working within a certain geographical and political context were selected as interviewees. In a wider study, broader perspectives should be sought. It should also be noted that this researcher works full-time in a London-based public-sector built environment role.

## 5 Analysis

### 5.1 Policy – The London Plan

The UGF policy was introduced to London in 2021 in the London Plan, the spatial planning strategy for London (Greater London Authority, 2021a). This means that the policy was brought forward by a regional combined authority rather than by central government. With little stretching of the theoretical concept, this demonstrates distinct parallels to Swyngedouw's (2007a, 2007b, 2009) governance-beyond-the-state, a key 'tool' of the post-political. In theory though, a more local scale of planning would logically yield more power to citizens and local communities but the motivation for this shift can undermine the benefits (Allmendinger & Haughton, p96). The legislation that instigated the GLA (drafted by central government) for example has three primary functions, the first of which is "promoting economic development and wealth creation in Greater London" (GLA Act cited by Greater London Authority, 2021a, p2). If the motivation of localising is to generate monetary benefit, then particularly in a city such as London with a huge amount of land value to be captured, the regional authority's priority could become maximising this fiscal value rather than focusing on the traditional benefits of localism. This resonates with the economic benefits of greening factor policies highlighted by Baycan-Levent & Nijkamp (2009, p1) that can be argued to push the tools into 'post-political' territory.

To only consider the economic motives of the London Plan would be to undermine the complexity of the situation, as when examining the benefits of the greening tools for Baycan-levent & Nijkamp (2009). In combination with economic growth, the GLA was also created to promote social development and to protect the environment. This gives the organisation a significant breadth in terms of the ideologies, motivations and subsequent policies which govern London's spatial strategy. Indeed, the mandate for the London Plan is derived from a London-wide election for the Mayor. Whilst not politically driven in the 'heroic' sense, the policy platform can therefore be considered as politically driven in that it is derived from a democratic electoral process (although one could argue that the options in elections are drawn towards a 'post-political' vanishing point of consensus).

Not only is the mandate for the London Plan secured through a democratic process, the plan is also extensively consulted on externally suggesting that engagement is not seen as disruption as in the post-political, and that *some* form of politics or involvement from communities is present. Whilst the definition of 'political' involvement is a contested term (and extremely narrow in the cases of Ranciere and Swyngedouw [Ranciere cited by Swyngedouw, 2009]), a wider definition could not

deny an element of politics at play, particularly with the Mayor representing the politically opposing party to the national government.

Stepping away from the arguably 'post-political' virtues of the GLA and the London Plan itself, the structure of policymaking within the plan is also worth noting. The UGF policy can be found within a chapter devoted to green infrastructure and the natural environment (Chapter 8, p312-333). Rather than the UGF sitting alone as a purely technocratic approach to urban greening, it is part of a suite of policies that range from the objective to the subjective. Policy G3 (p304) for example calls for "the extension of Metropolitan Open Land designations... where appropriate" allowing for discretion at plan making or application stage (albeit the 'post-political' virtues of each are excluded from the scope of this study). Therefore environmental policy in the London Plan as a whole does not necessarily foreclose options for design although quantitative benchmarking policies like the UGF may do so in isolation.

## 5.2 Policy – London Plan Guidance, Urban Greening Factor

Urban greening tools like the UGF are generally designed to maximise the quality and/or quantity of urban greening in a given area. London's iteration apportions value to different types of green infrastructure (GI) based on the ecosystem services they supply. It then challenges proposed large-scale developments to achieve a baselined score for urban greening (0.4 for predominantly residential schemes and 0.3 for commercial). The guidance provides a calculator tool where inputted areas are multiplied by their respective nominal values as seen in fig. 3 to provide the score.

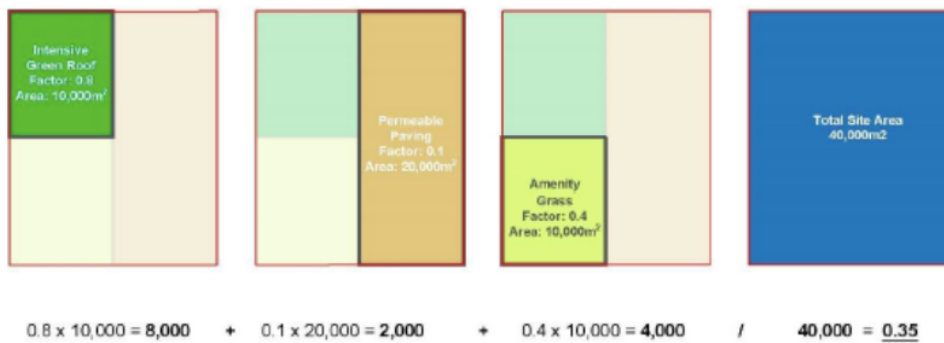


Figure 3: Illustration of how the UGF calculation works in practice. In this example  $((8,000 + 2,000 + 4,000) / 40,000 = a$  UGF score of 0.35. (Greater London Authority, 2021b, p10)

The policy has had a long history, beginning its development with a series of stakeholder workshops in 2019. Alongside the workshops, an equality impact assessment was undertaken to review the effects of the policy before the draft policy guidance was published. The policy was then included in the published London Plan in 2021 before a further engagement round was conducted. The final policy guidance with the accompanying engagement report is to be published in 2022.

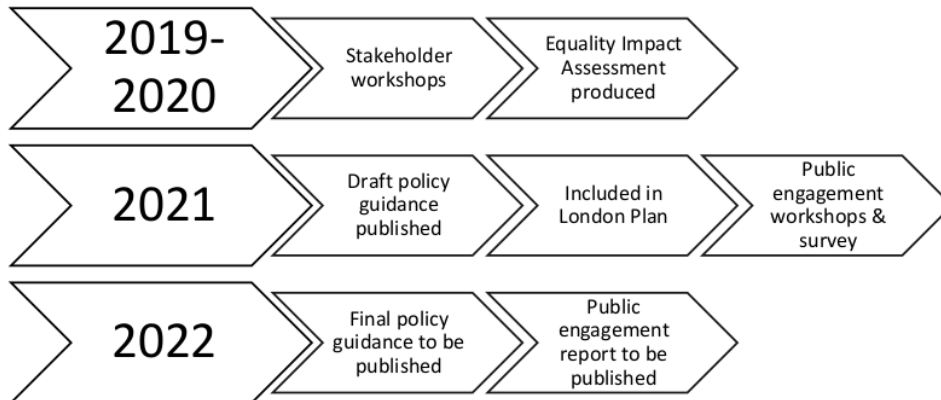


Figure 4: Timeline of the development of the UGF policy

From the perspective of the ‘tools’ dimension of the post-political analytical framework, the policy appears match some of the indicators. Engagement is clear both at London Plan and detailed policy stage. However, the UGF is a policy set by a regional authority that further localises by asking boroughs to set their own benchmark UGF scores. As argued by Swyngedouw (2007a, p8) this rescaling of government downwards can represent a strategic shift of power away from the central point of change, securing a consensual policy direction. However, the guidance suggests that Boroughs baseline their own green infrastructure in order to identify the “need and opportunity for new green infrastructure” (Greater London Authority, 2021b, p15). This should instigate variation where appropriate and refrain from concribing all places to the same treatment. This highlights a key contradiction in the application of post-political theory. Localism can be viewed as a shift of policy away from the heart of power to protect it from political change, or it can be perceived as a way to ensure place-specific, innovative outcomes within policy fields. The policy direction may change but, in the meantime, the local method of delivery ensures an element of local variation.

More pertinently, the policy specifically targets conversations between developers, designers and planners. The policy therefore prompts conversations between actors outside of the traditional



realms of the state and does not include the citizen at outcome stage, blatantly professionalising and privatising environmental policy outcomes and the designs of our cities. When viewed alongside the “broad brush potency” (Beveridge & Koch, 2017, p32) of the post-political concept, this behind-closed-doors characteristic of the UGF certainly fits the mould of this type of policymaking.

The policy is an example of a benchmarking tool as a technology of performance. It allows private interests (developers) to self-assess their performance in urban greening, bypassing the need for broader political processes. Theoretically the tool does not support the fast-tracking of an application through the planning system. Applicants must demonstrate their meeting of the targets within the same process that pre-London Plan 2021 applicants had to work through. As a consequence, the extent to which this constitutes a benefit in a ‘post-political’ manner is debateable.

### 5.3 Policy – Urban Greening Factor Consultation Questionnaire

The UGF Consultation Questionnaire is split into two sections; a ‘general’ section that discusses the policy and an equality impact assessment (EIA). The ‘general’ section focuses primarily on the clarity of information of the policy perhaps indicating some concern as to the complexity of the transferring the scoring mechanism from policy to practice. It is not clear as to who the consultation is intended for. The questions read as if they are intended for built environment professionals – “the information applicants are required to submit on the UGF will allow applicants and planners to accurately assess and verify UGF scores?” (GLA, 2021c, p2). However the engagement portal indicates that this is a consultation for the general public. This reflects the nature of the policy as a tool for professionals rather than the public and as such, somewhat limits the likely engagement from those that aren’t urban development actors (the existing police order).

The second section of the questionnaire focuses on the impact of the policy on people with various protected characteristics (the EIA). This is a legal requirement when preparing new strategic plans like the London Plan, and as such, does not constitute engagement above and beyond the bare minimum.

### 5.4 Interviews

Five interviews were conducted with built environment professionals involved in the development, submission and/or evaluation of UGF scores. Each interviewee was asked a series of questions loosely grouped into the three dimensions of the analytical framework established in this study. Below, the analyses of responses are organised by dimension and all interviewees' contributions are considered under each dimension. For the purposes of this analysis the interviewees are referred to as interviewee A-E.

#### *5.4.1 Motivations*

- Why do you think the UGF policy been included in the latest London Plan?
- What is the purpose of the UGF?

The main motivations for the post-political city identified in the literature review were the neoliberal belief in the shift of the state toward the market, the pursuit of progress and delivery (particularly in regard to housing) and a collective fear of catastrophe as in the case of the environment. In the case of the interviewees, most regarded the inclusion of the UGF policy in the London Plan (GLA, 2021a) as a practical move to ensure minimum standards for urban greening in our cities. Whilst some interviewees did refer to climate change and environmental degradation, there seemed to be a far greater range of motivations from the perspectives of the interviewees than those posited by the post-political concept.

Rather than environmental calamity being the driver of the policy, many respondents noted the poor performance of urban greening measures in large developments across London as the key issue (rather than the larger scale collective impacts of poor urban greening measures). Interviewee A asserted that there is a fundamental problem in urban greening both with the delivery and 'intensity' of that which is provided. Interview D agreed stating that historically, landscape was considered at a late stage and wasn't integrated into schemes well enough. These responses suggest that the policy may not be motivated by a neoliberal will to empower private interests but in fact be an anti-market manipulation or response to market failure. This is in stark contrast to some reviews of environmental assessment tools which have been used to drive competition in the marketplace (Riviera cited by Haapio, 2012; Ameen et al. 2018).

Conversely to both of these notions was interviewee E's response that suggested a somewhat more 'post-political' motivation for the UGF policy. He argued that, for many developers, the UGF policy is

merely a formality as the market is dictating (through customers purchasing power) that urban greening is a 'must'. The intimation being that the policy merely reflects a market-led shift that is already occurring. This is the clearest indication that 'post-political' motivations are at play. Arguably, the policy merely reproduces the market-driven changes in design and demand rather than proactively chasing positive outcomes for residents. This would suggest the policy is almost a nod to the post-political neoliberal police order already setting the agenda through market forces rather than a manipulation of the market as other respondents argued.

Furthermore, interviewees also related the policy back to other forms of benefit, not just environmental. Whilst the Draft UGF Policy Guidance (GLA 2021b) notes some other benefits of urban greening via contributions to other policies, interviewees felt the impact of urban greening was far more reaching (and important) than this, perhaps alluding to a wider motivation than those 'post-politically' motivated notions. Indeed, the lockdowns of the Covid-19 crisis and the increased usage and need for green spaces associated was mentioned by interviewees A and B as a significant motivation for the UGF policy.

Interviewees B and D intimated that the reason the UGF policy was included in the London Plan was to 'encourage landscape led design' qualifying the statement with their experience that most developments attended pre-application meetings with planners (before the UGF policy) with very few indications of their plans for landscaping. The UGF tool in their view was intended to ensure conversations about urban greening were included within these sessions. This suggests that rather than the UGF policy further privatising or promoting the 'governance-beyond-the-state' (Swyngedouw, 2007a, p7), it is a tool to make the planning process more transparent for the parties involved. If this is played out to its logical conclusion, submitted applications which go out to public consultation should have more considered and detailed urban greening measures included allowing for greater participation. Furthermore, Interviewee B argued that providing detail at approval stage of a planning application prevented landscaping being value-engineered out of schemes post-planning, supporting the accountability of the process. Again, this suggests that the motivation for the policy and the types of conversations between organisations within the police order it instigates are not intended to fast track delivery but to support the discretionary planning process. Indeed, Interviewee B argued that this motivation was compounded by understaffing in planning departments. Enforcement is often lacking and therefore developers can get away without delivering on their permissions. The UGF is a means by which developers can easily be held to

account with less resource, particularly when plans are clearer. This again reflects more of an anti-market sentiment in contrast to the neoliberal 'post-political' perspective. In that sense, if Swyngedouw (2007a, 2007b, 2009) did not employ such a narrow and "heroic" (Beveridge & Koch, 2017, p36) definition of the political, the policy could be considered as a political act. Particularly in the context of a the GLA employing the policy under Labour leadership (traditionally more pro-market regulation) amid a Conservative national government (more pro-free market).

Additionally, Interviewee A posited that, far from being a 'box-checking exercise', the policy's purpose was to redress the 'planning balance' by ensuring urban greening was adequately included in creating sustainable places. As seen in the literature review, sustainability is arguably a tool of the post-political as a vague catch all for the predominant policy direction, however, the pursuit of holistically designing place as noted by Interviewee A is surely the objective of the built environment profession. If the UGF policy is motivated by an intention to ensure this 'holistic understanding' is pursued, then this feels far from Swyngedouw's (2007a) fears of prescription from benchmarking tools.

#### *5.4.2 Tools*

- How is the UGF policy implemented by the Borough (that your project is in/that you work for)?
- To what extent is the UGF a standalone policy?
- To what extent has the UGF changed the amount of scrutiny on landscaping and sustainability from the public, regional and national governments, and planners?

Interviewees generally agreed that the element of the UGF policy that asks boroughs to set their own targets is yet to be implemented. Interviewee B posited that there is a lack of resource to do this, building on from the point referenced in the 'motivations' questions. It therefore remains to be seen the effect further localisation may have and whether it does indeed yield the 'post-political' effects of shifting away from centralised governmental power as Swyngedouw argues (2007a, 2007b, 2009).

Respondents did, however, note how boroughs were employing the UGF policy with the targets from the London Plan. From a 'post-political' perspective, if planners were treating the 0.4 target for residential schemes as a balance that, if reached, meant no further discussion on landscaping, this would foreclose innovation and diversity. However, Interviewee D argued that, although planners

were often strict about the target, they also reviewed schemes holistically. For instance, if a scheme wasn't reaching the target score but had given over roofs to solar panels rather than green roofs, this would be viewed favourably given the overall impact of the scheme. This suggests a pragmatism and a discursive response to the policy rather than a fast-tracking of development.

Reinforcing this notion, multiple respondents discussed the difficulty of reaching the prescribed targets. If the benchmark were too easy, the tool could be labelled as a 'post-political' nod to the sustainability agenda rather than an impactful challenge to the police order as was argued by some respondents in the 'motivations' questions. Interviewee A certainly experienced troubles reaching the targets in their projects. Again, the response to reaching the target was not rebuttal – the discussions with planners were "quite involved" and all parties wanted the landscaping to "thrive". This view of collaboration and co-design on the ground versus the cynical 'post-political' view of a box-checking exercise is an optimistic reflection on the true outputs of the tool. Whilst interviewee C noted mixed responses from planners in regard to this discursive approach, in general, the majority of schemes that respondents had worked on since the UGF was implemented seemed to utilise the policy as a discussion point rather than cause to shelve landscape design on achieving the benchmark.

In terms of the UGF policy acting as a standalone strategy, most respondents referenced other environmental policies (in particular, biodiversity net gain) that affected urban greening. Interviewees also mentioned interfaces with other policies (whether by design or otherwise). Interviewee A for example noted how building regulations had restricted urban greening on one of her projects as green walls were seen as a fire risk. Interviewee D also said that he felt the policy was siloed:

*"You can put a lot of attention and effort into developing a design... for the sake of getting that urban greening score up. But actually, when you look at the longer-term vision for the site and the potential in terms of sustainability and future proofing... the highest urban greening score isn't always going to give the best scenario [for supporting climate change]"*.

This highlights some compartmentalisation of policy as posited by Raco. (2015, p125). However, Raco's (2015, p125) compartmentalised policymaking point referred to the intentional siphoning off of policies or policy areas in order to make holistic changes to the police order more difficult to envision or enact. The discretionary planning system in the United Kingdom of which the UGF policy

is part, means that all policies deemed as material must be considered in a planning application. Interviewee A discussed the idea of 'trade-offs' when discussing an application with planners or a planning committee suggesting that meeting all policies is extremely difficult and that concessions have to be made in order to deliver schemes that are of benefit to an area with all things considered. Interviewees A & E noted that the 0.4 target was not always fixed and schemes could be approved with lower scores if they provided benefit elsewhere, as in Interviewee D's solar panel example. Whilst Interviewee E argued the policy had missed an opportunity by not including elements about the social benefits of different types of urban greening, on the whole, interviewees felt that the policy was not compartmentalised and was in fact considered as part of a far greater negotiation, albeit as a feature of the system it works within rather than via the implementation of the policy itself.

Discussing how planners and boroughs have responded to the policy, all interviewees suggested that the public were not engaging with the policy. Whilst this is not surprising given the stated purpose of the policy as a tool for planners, developers and designers, interviewees did express concern about the lack of engagement in landscaping, particular considering the intimate link between urban greening and the climate crisis. This potentially reinforces the perspective of the environmental policy as the epitome of the post-political. If the public does not engage while policy continues to evolve in this arena to reinforce the consensus of environmental degradation, then the police order may be functioning at its 'post-political' zenith where engagement is all but irrelevant in the machinations of urban planning.

#### *5.4.3 Outcomes:*

- To what extent does the UGF promote innovation from different interests in new developments?
- To what extent does the UGF meet its objectives of maximising green infrastructure with a view to decreasing the sustainability impact of the built environment?

Responses to whether the UGF policy supported innovation were mixed. Interviewee C felt that the policy simplified landscape schemes by forcing more complex landscape design into rigid categories. As a result, their landscape design practice ensure that the policy was not used as a design tool but as a tool for reviewing draft designs. This response to the policy appears to sidestep pre-determined outcomes that appear not to embrace the political as defined by Swyngedouw (2007a, 2007b, 2009). However, this view looks at the policy in singularity, Interviewee B felt that achieving the UGF score

of 0.4 for residential development in combination with other policies 'requires ingenuity' to balance all the demands. Indeed, Interviewee A argued that, although benchmark regulations do stifle innovation to some degree (for example the use of statutory minimum space standards and the impact on building form in London), the innovators will continue to innovate because they see other 'value' in doing so. Summarising Interviewee A asked;

*"What is the lesser of two evils, bringing everyone up to the same level or constraining people who were performing slightly better?"*

This suggests that benchmarking tools like the UGF may limit truly radical, political thinking for some, whilst others may continue to innovate regardless and others will be forced to deliver to a basic standard. This makes the assertions of the post-political concept difficult to empirically observe, reducing its efficacy as an explanatory concept. Innovative urban greening still occurs, potentially to a lesser extent but this is anecdotal evidence as we will never know the alternative schemes that were never built.

Interviewee D posited an altogether different response to the UGF's promotion of innovation that didn't necessarily reflect on regulatory compliance as a constraining factor. He suggested that, by allocating high scores for landscaping features that require technical ingenuity to include within a scheme, these types of design are incentivised. Intensive roofs were identified as they come with 'various constraints and challenges'. Here, regulatory benchmarks encourage innovative behaviour rather than restrain it in some way, the opposing outcome to what one would expect through a 'post-political' tool. Whilst it could still be argued that this innovation is permissible as it is within the parameters of the 'post-political' consensus, this is extremely difficult to empirically observe.

In terms of how respondents felt the policy was meeting its objective of maximising green infrastructure, Interviewee E, whilst mildly positive about the policy, criticised it for not considering the breadth of the issue. Securing green infrastructure at planning stage is important but he argued that it did not address the key long-term problems with the delivery of green infrastructure. Maintenance and the skills shortage in delivering maintenance services are both neglected meaning that the UGF is at risk of creating green spaces that don't last. If we think of the UGF policy as an outcome of post-politics then Interviewee E appears to argue that the policy is exactly the unimaginative, iterative change that the post-political police order maintains. It could be argued that

the policy, in its relative weakness on the issue of urban greening and its long-term stewardship, demonstrates a policy agenda that does not stretch housebuilders and private developers enough.

On a related point, interviewee C suggested that the policy did not reflect some key scientific considerations arguing for a more scientific approach to the scoring. Arguably, the policy is a box-checking exercise for developers (although this was not a universally held opinion among respondents) and, the factor should consider variance in species as an example of more appropriate complexity. Different plant and tree species have different contributions to climate change and environmental resilience, “some species are better than others at air pollution absorbance” for example. This response seems to advocate for a more prescriptive approach which perhaps tightens the consensus of the police order in establishing the policy rather than promoting innovation. It also represents another clear link to the catastrophising of the police order that Swyngedouw (2009) argues is the cause of the conceptual issue.

The majority of interviewees however, were positive about the impact the UGF policy was having (although most acknowledged that there was a long way to go for urban greening to reach its full potential). Interviewee D referred back to the concept of landscape led design that he felt the UGF was encouraging, a view shared with Interviewees A & B at points in the interview. This is the most pertinent point and reflects back to the point Interviewee A made about holistic design. If the policy isn't a box-checking benchmarking tool but actually encourages reflection on urban greening within a wider planning process (including public participation loosely from the public via planning consultations and the details included within), then it is problematic to posit that the policy merely reproduces a consensus.



## 6 Conclusions

The post-political concept is a descriptive means for understanding recent changes in planning policy. The tendency of urban policy toward privatisation is clear and indeed, the epitome of post-politics, urban environmental policy (as posited by Swyngedouw (2009)), does seem to rely on a shared consensus that the policy direction must change due to impending environmental catastrophe. However, Swyngedouw's (2007a, 2007b, 2009) definition of the political casts aside policies like the UGF, that work with other policies and the system itself to purport a holistic production of urban spaces that creates genuinely comfortable and enjoyable cities.

Few interview responses suggested the motivation for including the UGF in the London Plan was to regulate the outputs of the design process. Whilst interviewee C did argue that the scores given for individual types of urban greening could diminish the array of options to a designer by reducing green cover to mutually exclusive groups, acknowledgement was also made to how this could be avoided by using the policy as a review tool rather than a design tool.

Respondents did note some economic value to urban greening and the convenience of employing a policy that is likely to financially benefit those who use it. However, to argue that the UGF's primary function is to reproduce the values of the police order or to collectively drive market values is to ignore the overwhelming benefits of green spaces on other aspects of life and urbanity. Diminishing the front-loading of urban greening via the promotion of landscape led design as 'post-political' because it does not classify as a 'heroic' political act is to undermine much of the policy we have

Alternatively, Interviewee C seemed to encapsulate the operational response to what could be considered a 'post-political' tool based on some of the characteristics identified in this study. A policy may be 'post-political' if it is considered as such. If designers and developers refer to the UGF benchmark as a hoop to jump through, then innovation will be limited and the most cost-effective means of reaching a core of 0.4 (for residential developments) will be mass-produced across London. Alternatively, if the policy is reviewed as a check within a pre-existing process which, when necessary, responds to reason and context, then surely the policy is not 'post-political' as it is not motivated to reproduce a consensus but to challenge city builders to reach their maximum potential.

Taking this argument to its logical endpoint, the post-political concept seems to be a normative world view. It is value laden in its definition of what is political ascribing "heroic and anti-heroic" status to some forms of action but not others (Beveridge & Koch, 2017, p36). This makes the application of the theory to the operation of a policy like the UGF a question of perspective. The contrast in views of interviewee D and Interviewee E articulate the antagonisms that arise within professionals working with the same policy on a regular basis. Interviewee D suggests the policy is a practical tool for correcting market failure, pushing private interests to do more for the common good. Conversely, Interview E sees a policy that reinforces existing market forces who would develop urban greening regardless of the affirmatory policy. Both views cannot be correct, yet both appear valid at least in argument, and therefore, the post-political concept is not a descriptive concept to apply to operational policymaking.

## 7. Appendices

### 7.1 Appendix 1 – Tools of de-politicisation

Author	De-politicisation Tool	Tool Operationalised
Raco (2015, p125-126)	Compartmentalised policy making	Reduction of holistic ideological change to manageable parts by disconnecting them from the whole. Discourages 'political' thought by foreclosing new ways of thinking about the police order.
	Project management focus	Form of privatisation that shifts power from elected politicians (those susceptible to our <i>proper political process</i> ) to subject matter experts with specific outputs, diminishing the opportunity for the 'political' to generate change.
	Private/public contractual arrangements	Form of privatisation that shifts power from elected politicians to private corporations, diminishing the opportunity for the 'political' to generate change.
	Engagement as disruption	Technocratic focus on decision-making produces a 'right' outcome based on objective, technocratic truth. Engagement with citizens clouds this 'truth' and is therefore side-lined or seen as a necessary evil where the outputs are not included in the policy agenda. This forecloses any feedback or incorporation of political expression.
Swyngedouw (2007a)	Privatisation	Shifting emphasis away from the citizen and politician toward private companies reducing the impact of the 'political'.
	De-regulation	Shifting the police order away from traditional democratic governance systems reducing the emphasis of the citizen through the political process.
	Shifting power to higher levels of government (e.g. European Union)	Shifting the police order away from the state obfuscating the place at which dissent is targeted.
	Shifting power to lower levels of government (e.g. devolution)	Shifting the police order toward localised initiatives that do not provide an opportunity to influence wholesale political change.
	Technologies of performance - benchmarking	Imposition of state-backed parameters and targets to allow actors to self-assess performance excluding the need for political interruption.

## 7.2 Appendix 2 – Interview Questions

### Motivations:

- Why do you think the UGF policy been included in the latest London Plan?
- What is the purpose of the UGF?

### Tools:

- How is the UGF policy implemented by the Borough (that your project is in/that you work for)?
- To what extent is the UGF a standalone policy?
- To what extent has the UGF changed the amount of scrutiny on landscaping and sustainability from the public, regional and national governments, and planners?

### Outcomes:

- To what extent does the UGF promote innovation from different interests in new developments?
- To what extent does the UGF meet its objectives of maximising green infrastructure with a view to decreasing the sustainability impact of the built environment?

## 7.3 Appendix 3 – Interviewee Information Sheet

As part of my MSc in Urban Design & City Planning, I am undertaking a dissertation focusing on the Urban Greening Factor and its applicability as a case study for the post-political, a concept that charges contemporary planning policy with the foreclosure of bottom up, radical change. The research aims to look at the motivations for using the UGF, the tool and how it works and the outcomes it generates. To understand this, I am interviewing built environment professionals to understand practitioners' views on this topic.

During the interview, a recording and transcription will be taken. These will solely be done for the purposes of supporting the researcher in drawing the most from the interview and will not be published alongside the final report. Interviewees and the organisations they work for will also remain anonymous throughout the study. All recordings, notes and transcripts will be stored on password protected devices and folder and will be deleted on submission of this study on 5th September 2022.

Participation in this study is voluntary and participants may decide to withdraw from the study at any point and request that their data be discounted from the research and deleted.

If you have any further questions, feel free to ask via email at [ucbqeg0@ucl.ac.uk](mailto:ucbqeg0@ucl.ac.uk) or via phone at 07508724003. If you would like a paper and signed copy of this consent form to sign for the purposes of the researcher or for yourself, please let the researcher know and this can be provided.

#### 7.4 Appendix 4 – Risk Assessment Form

## RISK ASSESSMENT FORM FIELD / LOCATION WORK



**DEPARTMENT/SECTION:** BARTLETT SCHOOL OF PLANNING

**LOCATION(S):** LONDON, UK

**PERSONS COVERED BY THE RISK ASSESSMENT:** Ned Adams-Felton

**BRIEF DESCRIPTION OF FIELDWORK (including geographic location):** Data collection will be carried out through interviews with built environment professionals. All interviews will be held electronically via Microsoft Teams.

### COVID-19 RELATED GENERIC RISK ASSESSMENT STATEMENT:

Coronavirus disease (COVID-19) is an infectious disease caused by coronavirus SARS-CoV-2. The virus spreads primarily through droplets of saliva or discharge from the nose when an infected person coughs or sneezes. Droplets fall on people in the vicinity and can be directly inhaled or picked up on the hands and transferred when someone touches their face. This risk assessment documents key risks associated fieldwork during a pandemic, but it is not exhaustive and will not be able to cover all known risks, globally. This assessment outlines principles adopted by UCL at an institutional level and it is necessarily general. Please use the open text box 'Other' to indicate any contingent risk factors and control measures you might encounter during the course of your dissertation research and writing.

Please refer to the Dissertation in Planning Guidance Document (available on Moodle) to help you complete this form.

**Hazard 1: Risk of Covid -19 infection during research related travel and research related interactions with others (when face-to-face is possible and/or unavoidable)**

**Risk Level - Medium /Moderate**

**Existing Advisable Control Measures:** Do not travel if you are unwell, particularly if you have COVID-19 symptoms. Self-isolate in line with NHS (or country-specific) guidance.

Avoid travelling and face-to-face interactions; if you need to travel and meet with others:

- If possible, avoid using public transport and cycle or walk instead.
  - If you need to use public transport travel in off-peak times and follow transport provider's and governmental guidelines.
  - Maintain (2 metre) social distancing where possible and where 2 metre social distancing is not achievable, wear face covering.
  - Wear face covering at all times in enclosed or indoor spaces.
  - Use hand sanitiser prior to and after journey.
  - Avoid consuming food or drinks, if possible, during journey.
  - Avoid, if possible, interchanges when travelling - choose direct route.
  - Face away from other persons. If you have to face a person ensure that the duration is as short as possible.
  - Do not share any items i.e. stationary, tablets, laptops etc. If items need to be shared use disinfectant wipes to disinfect items prior to and after sharing.
  - If meeting in a group for research purposes ensure you are following current country specific guidance on face-to-face meetings (i.e rule of 6 etc.)
  - If and when possible meet outside and when not possible meet in venues with good ventilation (e.g. open a window)
  - If you feel unwell during or after a meeting with others, inform others you have interacted with, self-isolate and get tested for Covid-19
  - Avoid high noise areas as this mean the need to shout which increases risk of aerosol transmission of the virus.
  - Follow one way circulation systems, if in place. Make sure to check before you visit a building.
  - Always read and follow the visitors policy for the organisation you will be visiting.
  - Flush toilets with toilet lid closed.
- 'Other' Control Measures you will take (specify):

**NOTE: The hazards and existing control measures above pertain to Covid-19 infection risks only. More generalised health and safety risk may exist due to remote field work activities and these are outlined in your Dissertation in Planning Guidance document. Please consider these as possible 'risk' factors in completing the remainder of this standard form. For more information also see: [Guidance Framework for Fieldwork in Taught and MRes Programmes, 2021-22](#)**

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.*

Low risk – Safety issue in home/workplace  
Environment for interviews is likely to be in own workplace/at home.

**CONTROL MEASURES**

**Indicate which procedures are in place to control the identified risk**

- |                          |                                                                                               |
|--------------------------|-----------------------------------------------------------------------------------------------|
| <input type="checkbox"/> | work abroad incorporates Foreign Office advice                                                |
| <input type="checkbox"/> | only accredited centres are used for rural field work                                         |
| <input type="checkbox"/> | participants will wear appropriate clothing and footwear for the specified environment        |
| <input type="checkbox"/> | refuge is available                                                                           |
| Y                        | work in outside organisations is subject to their having satisfactory H&S procedures in place |
| <input type="checkbox"/> | OTHER CONTROL MEASURES: please specify any other control measures you have implemented:       |

**EMERGENCIES**

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

*e.g. fire, accidents*

Risk – Fire or H&S emergency at place of study  
Location of interviews is likely to be in office. Emergency procedures are in place throughout the office building for fire and first aid.

**CONTROL MEASURES**

**Indicate which procedures are in place to control the identified risk**

- |                          |                                                                                                                                                                 |
|--------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <input type="checkbox"/> | participants have registered with LOCATE at <a href="http://www.fco.gov.uk/en/travel-and-living-abroad/">http://www.fco.gov.uk/en/travel-and-living-abroad/</a> |
| <input type="checkbox"/> | contact numbers for emergency services are known to all participants                                                                                            |
| <input type="checkbox"/> | participants have means of contacting emergency services                                                                                                        |
| <input type="checkbox"/> | a plan for rescue has been formulated, all parties understand the procedure                                                                                     |
| <input type="checkbox"/> | the plan for rescue /emergency has a reciprocal element                                                                                                         |
| Y                        | OTHER CONTROL MEASURES: please specify any other control measures you have implemented:<br>Workplace emergency protocols in place                               |

**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 ?

**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:

**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.*

Low risk – Interviews held with built environment professionals  
 Most interviews are likely to be online/in a professional environment (office) with others around.

**CONTROL MEASURES**

Indicate which procedures are in place to control the identified risk


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



Interviews to be held in work offices

**FIELDWORK 2**

May 2010

**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?

Low risk – Computer work  
Low risk – General ill health

**CONTROL MEASURES**

**Indicate which procedures are in place to control the identified risk**

- all participants have had the necessary inoculations/ carry appropriate prophylactics
- participants have been advised of the physical demands of the research 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 should carry sufficient medication for their needs
- Y** OTHER CONTROL MEASURES: please specify any other control measures you have implemented:  
Appropriate display screen equipment set up to be utilised

**TRANSPORT**

**Will transport be required**

**NO**

**YES**

**Y**

**Move to next hazard**

**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?

Low risk – Public transport to office (London underground)

**CONTROL MEASURES**

**Indicate which procedures are in place to control the identified risk**

- Y** 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](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
- OTHER CONTROL MEASURES: please specify any other control measures you have implemented:

**DEALING WITH THE PUBLIC**

Will people be dealing with public

YES

If 'No' move to next hazard  
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?

Low risk – Causing offence/misinterpretation by interviewees

**CONTROL MEASURES**

Indicate which procedures are in place to control the identified risk

- all participants are trained in interviewing techniques
- advice and support from local groups has been sought
- participants do not wear clothes that might cause offence or attract unwanted attention
- Y interviews are conducted at neutral locations or where neither party could be at risk
- Y OTHER CONTROL MEASURES: please specify any other control measures you have implemented:  
All participants selected will be professionals and known by myself or my colleagues

FIELDWORK 3

May 2010

**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?

**CONTROL MEASURES**

Indicate which procedures are in place to control the identified risk

- lone working on or near water will not be allowed
- coastguard information is understood; all work takes place outside those times when tides could prove a threat

- all participants are competent swimmers
- participants always wear adequate protective equipment, e.g. buoyancy aids, wellingtons
- boat is operated by a competent person
- all boats are equipped with an alternative means of propulsion e.g. oars
- participants have received any appropriate inoculations
- OTHER CONTROL MEASURES: please specify any other control measures you have implemented:

<b>MANUAL HANDLING (MH)</b>	<b>Do MH activities take place?</b>	<b>NO</b>	<b>If 'No' move to next hazard If 'Yes' use space below to identify and assess any risks</b>
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*e.g. lifting, carrying, moving large or heavy equipment, physical unsuitability for the task.*

Examples of risk: strain, cuts, broken bones. Is the risk high / medium / low?

**CONTROL MEASURES**

**Indicate which procedures are in place to control the identified risk**

- the departmental written Arrangement for MH is followed
- the supervisor has attended a MH risk assessment course
- all tasks are within reasonable limits, persons physically unsuited to the MH task are prohibited from such activities
- all persons performing MH tasks are adequately trained
- equipment components will be assembled on site
- any MH task outside the competence of staff will be done by contractors
- OTHER CONTROL MEASURES: please specify any other control measures you have implemented:

**SUBSTANCES**

Will participants work with substances

NO

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

*e.g. plants, chemical, biohazard, waste*

Examples of risk: ill health - poisoning, infection, illness, burns, cuts. Is the risk high / medium / low?

**CONTROL MEASURES**

Indicate which procedures are in place to control the identified risk

- the departmental written Arrangements for dealing with hazardous substances and waste are followed
- all participants are given information, training and protective equipment for hazardous substances they may encounter
- participants who have allergies have advised the leader of this and carry sufficient medication for their needs
- waste is disposed of in a responsible manner
- suitable containers are provided for hazardous waste
- OTHER CONTROL MEASURES: please specify any other control measures you have implemented:

**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

Have you identified any risks that are not adequately controlled?

NO  N  
 YES

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

**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:

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

Y 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 Juliana Martins

**FIELDWORK 5**

May 2010

## Ethical Clearance Pro Forma

It is important for you to include all relevant information about your research in this form, so that your supervisor can give you the best advice on how to proceed with your research.

You are advised to read though the relevant sections of [UCL's Research Integrity guidance](#) to learn more about your ethical obligations.

### Submission Details

**1. Name of programme of study:**

MSc Urban Design & City Planning

**2. Please indicate the type of research work you are doing (Delete that which do not apply):**

- Dissertation in Planning (MSc)

**3. Please provide the current working title of your research:**

A review of environmental planning policy and the 'post-political' – the case study of the Urban Greening Factor.

**4. Please indicate your supervisor's name:**

Dr Juliana Martins

### Research Details

**5. Please indicate here which data collection methods you expect to use. (Tick all that apply/or delete those which do not apply.)**

- Interviews

**6. Please indicate where your research will take place (delete that which does not apply):**

- UK only

**7. Does your project involve the recruitment of participants?**

'Participants' means human participants and their data (including sensor/location data and observational notes/images.)

Yes

## **Appropriate Safeguard, Data Storage and Security**

### **8. Will your research involve the collection and/or use of personal data?**

Personal data is data which relates to a living individual who can be identified from that data or from the data and other information that is either currently held, or will be held by the data controller (you, as the researcher).

This includes:

- Any expression of opinion about the individual and any intentions of the data controller or any other person toward the individual.
- Sensor, location or visual data which may reveal information that enables the identification of a face, address etc. (some post codes cover only one property).
- Combinations of data which may reveal identifiable data, such as names, email/postal addresses, date of birth, ethnicity, descriptions of health diagnosis or conditions, computer IP address (of relating to a device with a single user).

Yes

### **9. Is your research using or collecting:**

- special category data as defined by the General Data Protection Regulation\*, and/or
- data which might be considered sensitive in some countries, cultures or contexts?

\*Examples of special category data are data:

- which reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership;
- concerning health (the physical or mental health of a person, including the provision of health care services);
- concerning sex life or sexual orientation;
- genetic or biometric data processed to uniquely identify a natural person.

No

### **10. Do you confirm that all personal data will be stored and processed in compliance with the General Data Protection Regulation (GDPR 2018)? (Choose one only, delete that which does not apply)**

- Yes

### **11. I confirm that:**



- The information in this form is accurate to the best of my knowledge.
- I will continue to reflect on and update these ethical considerations in consultation with my supervisor.

Yes

## 8. Bibliography

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FINAL GRADE

GENERAL COMMENTS

# /100

## Instructor

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