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Opening up infrastructure planning

The need for better public
engagement



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By Amy Mount

Green Alliance

Green Alliance is a charity and independent think tank focused on ambitious leadership for the environment. We have a 35 year track record, working with the most influential leaders from the NGO, business, and political communities. Our work generates new thinking and dialogue, and has increased political action and support for environmental solutions in the UK. This report is published under Green Alliance's Low Carbon Energy theme, which is focused on the renewal and rapid decarbonisation of the UK energy sector. This is an independent report. The views expressed are Green Alliance's own.

Acknowledgements

Thank you to all the individuals that contributed to this work through interviews and attending workshops. In particular, thanks to Adrian Fox, The Crown Estate; Angus Walker, Bircham Dyson Bell; Craig Jones, Alstom; Helen Pallett, University of East Anglia; Hugh Ellis, TCPA; Matthew Spencer, Faye Scott, Cecile Kobryner and Mia Rafalowicz-Campbell, Green Alliance; Jiggy Lloyd, environmental consultant; Joss Garman, IPPR; Dr Matthew Lockwood, Exeter University; Neil Sinden and Paul Miner, CPRE; Professor Nick Pidgeon, Cardiff University; Phil Armstrong, National Grid; Phil Brogan, RES; Robbie Owen, Pinsent Masons; Simon Burall and Clive Mitchell, Involve; Aedan Smith and Simon Marsh, RSPB; Simon Roberts, Centre for Sustainable Energy; Sian Berry and Stephen Joseph, CBT; Steve Schofield and Claire Swadkin, Shell; Professor Susan Owens, Cambridge University; and Tony Burton, founder of Civic Voice.

We are grateful to National Grid, Shell and Siemens for supporting this work.

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SIEMENS

Green Alliance
36 Buckingham Palace Road
London SW1W 0RE
020 7233 7433

ga@green-alliance.org.uk
www.green-alliance.org.uk
blog: greenallianceblog.org.uk
twitter: @GreenAllianceUK

The Green Alliance Trust
Registered charity no. 1045395
Company limited by guarantee
(England and Wales) no. 3037633
Registered at the above address

Published by Green Alliance,
February 2015
ISBN 978-1-909980-39-6

Designed by Howdy

Cover Photo by Paul West

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Executive summary

Infrastructure has been moving up the political agenda in recent years, with several authoritative reports building a strong case for a more strategic approach. This reflects widespread concern that conflict around individual infrastructure schemes makes delivery very much harder. This report uses examples of recent controversies over energy and transport schemes to explain that the root of the problem is differing assumptions about why we need infrastructure. We make the case that public engagement is critical to finding common ground between different stakeholders and making infrastructure delivery successful in the UK.

As the public feels excluded from decision making, people become disengaged from policy and distrustful of the motives of those proposing and delivering it.¹ Preventing public challenge in one forum is likely to force it elsewhere. The government's approach to fracking, for example, has proceeded on the basis that public resistance to the technology is simply due to ignorance. The chancellor has made £5 million available to "provide independent evidence" about fracking, but even sums of this scale won't deal with the fundamental problem of mistrust: people are uncomfortable with their lack of influence, and there is a belief that decisions are not being made in the public interest.

There are three fundamental problems with the current state of infrastructure decision making:

- **Conventional politics alone cannot secure a public mandate for new infrastructure**
Politicians are elected with, at best, a partial mandate to make decisions about the UK's infrastructure, and the rest of that mandate must be earned through public engagement between elections.
- **The public is not involved enough in defining infrastructure need**
Many of the most intractable planning controversies boil down to questions about whether the proposed infrastructure is really necessary. Yet the definition of need remains the most opaque part of the decision making process.
- **There is a gap in strategic planning, and associated public engagement, between the national and local levels**
There is no space for the public to participate in strategic, place-based discussions about where infrastructure should go; the different ways in which needs could be met; and the trade-offs that such choices will involve.

Currently, the only opportunity the public has to influence debates about national infrastructure need is during the consultation period for National Policy Statements (NPSs). But quietly asking people to comment on pages of dry, wordy documents barely counts as engagement. Of the consultations for NPSs that have taken place, the one that attracted the most attention was on roads and railways. But this received just 5,800 submissions, equivalent to one in every 9,300 or so English people. That is a similar number of people to the crowd that marched in protest against

the construction of a single nine mile stretch of road – the Newbury bypass – in 1996.²

To deliver infrastructure that provides social benefit and moves the low carbon transition forward, these problems must be addressed. Our recommendations, set out below, include two changes to infrastructure planning, each with an associated public engagement dimension essential to their success, and a brand new institution to provide the required support and expertise.

What is needed:

**1/
A strategic approach to infrastructure planning at national level, with a civil society advisory council**

The UK needs a national infrastructure strategy that is long term and underpinned by an evidence based assessment of needs. It should integrate all infrastructure sectors, considering both demand and supply side options, consistent with environmental objectives such as carbon budgets. We recommend the establishment of a civil society advisory council, as a formal and transparent part of the national infrastructure planning process.

**2/
Spatial planning at combined authority level, informed by local infrastructure dialogues**

Strategic planning, accompanied by public dialogue, is needed at the combined authority level to fill the gap between national policy and local plans. As combined authorities form, we recommend that they develop infrastructure plans as part of their devolution settlement, using local public dialogue to inform and test their priorities.

**3/
A new body to act as an impartial facilitator of public engagement**

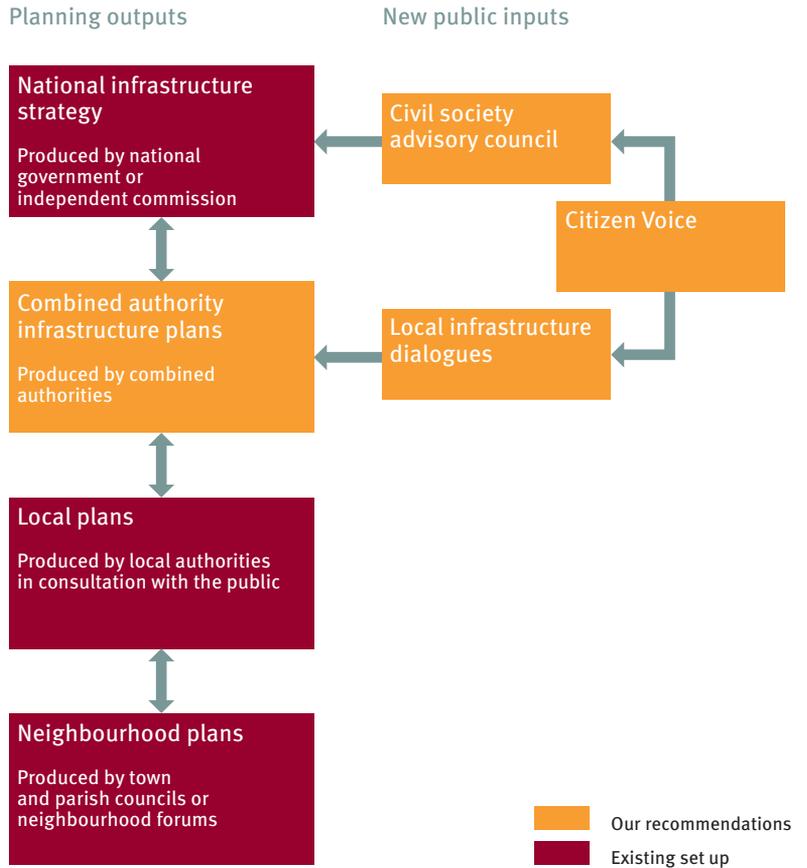
To provide public engagement capacity, we recommend the creation of an independent body, which we have given the working title of Citizen Voice, as an impartial facilitator and a well-resourced source of engagement expertise. It would have a critical role in facilitating a rich debate around the identification of need and strategic direction. Specifically, it would facilitate the civil society advisory council and support combined authorities in running local authority infrastructure dialogues.

The diagram overleaf indicates how these recommendations would fit together. In all cases, elected representatives remain the final decision makers.

The result would be a more strategic, effective and democratic planning system with greater public support for the resulting infrastructure projects. Developers would be offered clearer indications as to which types of infrastructure are needed and the most appropriate locations. This process would reduce the risk of protracted wrangling at the project stage, thus providing more certainty for businesses and investors.

Securing a public mandate for new infrastructure will be essential to successful delivery. What is needed is a democratic structure to support the perpetual task of establishing that mandate.

Building public engagement into strategic infrastructure planning



1 Introduction



“If practised effectively, public engagement in infrastructure planning will lead to more informed decisions of higher quality”

Picture a low carbon UK. The landscape probably features elegant wind turbines turning on the ocean horizon, and well insulated urban roofs peppered with solar panels. There might be charging points for the electric buses trundling between rural villages, hints of a larger and smarter electricity grid and, perhaps, a pipeline connecting a steelworks to a carbon storage facility under the North Sea. If we are going to decarbonise, we are going to need some new infrastructure.

The UK’s existing infrastructure is in a bad way, ranking 28th in the world, an embarrassment for a leading OECD economy.³ Businesses repeatedly call for the government to improve the situation, with the energy sector being a particular worry.⁴ A survey by the CBI in 2013 found that energy has now overtaken transport as the prime infrastructure concern for industry, with 90 per cent of firms surveyed worried about security of supply.⁵

In contrast, a later poll has found that the general public doesn’t see a particular need to upgrade infrastructure; people are unconvinced by the oft-repeated warning that the “lights will go out.” Only one in four is dissatisfied with national infrastructure quality, while 46 per cent are satisfied. There’s a perception that the short term disruption caused by building new infrastructure is not worth the potential future benefits.⁶

Nonetheless, the public does expect change, especially with regard to the transition to a low carbon energy system. An extensive study found that the British public “wants and expects change with regard to how energy is supplied, used and governed” with the caveat that politicians are expected to deliver the energy transition in a way that aligns with public values.⁷ This conclusion was borne out by a recent ComRes poll that revealed 68 per cent of the public supports ways to make it easier to get involved in the planning process.⁸

Securing a public mandate for new infrastructure will be essential to successful delivery. But the processes and institutions of the current system of infrastructure planning are inadequate for securing meaningful public input. To improve engagement, new initiatives are needed, which must go with the grain of devolution and deliberation. This will not eliminate controversy and outcry, and nor should it. But if practised effectively, public engagement in infrastructure planning will lead to more informed decisions of higher quality, with improved legitimacy.

If the public is excluded from debate, people become disengaged from policy and distrustful of the motives of those proposing and delivering it.⁹ Preventing public challenge in one forum is likely to force it elsewhere. Since the abolition of public inquiries for nationally significant infrastructure projects (NSIPs), pressure groups have increasingly resorted to judicial review; and, as these options diminish, opposition is pushed into less formal spaces.^{10,11} This can be seen with the protests and civil disobedience against fracking in Balcombe and other test sites.¹²

Making space for public engagement goes hand in hand with the task of making the planning system more strategic. Various organisations and individuals have built a strong case for the latter, most recently in the Labour Party commissioned Armitage Review of Infrastructure, but the central role of the former has been neglected. Armitage and others have assumed that the main problem with infrastructure is the length of time taken to reach decisions on projects. But the real issue is the lack of openness. This report seeks to address that imbalance, by focusing on how revitalised efforts to engage the public could strengthen and sanction a more strategic approach to infrastructure planning.

Due to the diversity of planning systems in different areas of the UK, the recommendations presented here are primarily directed at England, although some aspects are relevant to Wales, Scotland, and Northern Ireland. Examples are drawn from the energy and transport sectors, which are the two infrastructure sectors most relevant to the low carbon transition, but the report's recommendations can be applied to other sectors too. Our research involved a literature review, expert interviews and an expert workshop.

2 Existing engagement is inadequate



There are three fundamental problems with the current state of infrastructure decision making:

- Conventional politics alone cannot secure a public mandate for new infrastructure.
- The public is not involved enough in defining infrastructure need.
- There is a gap in strategic planning, and associated public engagement, between the national and local levels.

Conventional politics is inadequate

Many politicians assume a general election provides them with a mandate for any decision that they subsequently make, including those on infrastructure. While there are a few cases where this might be the case (for example, electing Zac Goldsmith in the knowledge that he would oppose a third runway at Heathrow), in general a ballot sheet is a very low resolution representation of the wide array of positions an MP might take on different issues. Politicians are elected with, at best, a partial mandate to make infrastructure decisions, and the rest of that mandate must be earned through public engagement between elections.

“Politicians are elected with, at best, a partial mandate to make infrastructure decisions”

Citizens have a right to participate in decisions that affect their lives and communities. This doesn't mean that decisions should be taken out of the hands of elected representatives, but it means that the public should have genuine opportunities for input. This will improve transparency and leave both decision makers and the public with a better understanding of the issues in question and the infrastructure that will be most valued by society.

Meaningful participation, however, has been held back in the UK by a political tradition that emphasises top down democracy, favouring leadership rather than participation and assuming that the government knows best. It is a view held by many people at the core of government, and it underpins British political institutions and processes.¹³

While the UK's recent history of infrastructure planning has been typified by inconstancy and unpredictability, the top down view of democracy has proved resilient. This is evident in a common response to the public consultation on High Speed Two (HS2): people expressed the view that a decision had already been made and their contribution would have little influence on the government's strategy.¹⁴

The most recent attempts by government to improve infrastructure planning have focused on the question of how to speed it up, rather than considering what was making it so slow and fraught in the first place. In 2008, Labour created the Infrastructure Planning Commission. The current government abolished it, moving its functions to the Planning Inspectorate, with final decisions resting with the secretary of state. But the idea that the system could be improved by building a public mandate into infrastructure planning, with engagement enabling better outcomes, has never had serious consideration.

Not enough public input in defining infrastructure need

Many of the most intractable planning controversies boil down to questions about whether the proposed infrastructure is really necessary. Yet the definition of need remains the most opaque part of the decision making process. This lack of transparency breeds mistrust, affecting the legitimacy of all decisions that cascade down from national infrastructure policy. There is a risk of a vicious circle: the public doesn't bother to turn up to engagement exercises that seem frustratingly superficial, as the major decisions already seem to have been made, while policy makers and developers increasingly treat engagement as tick box exercises, because they perceive that people are not interested.¹⁵

Despite the government's growing acknowledgement of the benefits of public engagement, opportunities are still too concentrated around the details of specific projects, rather than upstream definitions of the need for infrastructure and what it will enable.¹⁶ Justifications for new infrastructure often conflate the definition of need (such as better connections between Manchester and Leeds) with the identification of how a need should be met (a new high speed train line between the two cities).

The public is allowed very little space to discuss and define need and alternative ways of meeting it. As a result, these big questions end up getting squeezed, generally unsuccessfully and fractiously, into stages of the planning process that were never designed to handle such matters.

Public inquiries were not intended to be the place for debate about the need for services such as energy, mobility or waste management. But, for a long time, they were the only option, as the public had no opportunity to input before the project stage of infrastructure planning.¹⁷ As a result, a process that was supposed to inform ministers about objections to particular developments became a forum for deliberating and critically examining whether there was a national need for them.¹⁸

For example, during the public inquiry into Heathrow Terminal Five (the longest public inquiry in British planning history, running from May 1995 until March 1999), Friends of the Earth's arguments opposing the terminal centred on the question of need.¹⁹ The group disagreed with the government's claims that the terminal was essential for the UK's economy; it argued that London did not need more air capacity and that rail could provide a viable alternative.²⁰

“Technical studies can be insufficient if the public doesn’t trust the government’s assurances that risks will be managed”

Fracking: how not to do engagement

Currently, ‘need’ tends to be identified based on technical studies, which then form the government’s evidence base. But this can be insufficient if the public doesn’t trust the government’s assessment or its assurances that risks will be managed. Public engagement is essential if broad agreement is to be achieved on controversial topics. This is acutely evident in the case of fracking, which the coalition government has openly advocated, without providing space for public debate about a new technology that is of concern to many.

A letter written by the chancellor, George Osborne, and leaked to *The Guardian* reveals an intent to designate fracking as nationally significant infrastructure, as a way “to smooth the process to full production” and avoid the uncertainty of local planning decisions.²¹ Several technical studies support the government’s case, concluding that fracking presents low risks to public health and would have a low impact on overall greenhouse gas emissions, among others.²² But the public has been unconvinced from the start and, arguably, this position has entrenched in response to the government’s efforts to build support.

George Osborne’s pledge of £5 million in the 2014 Autumn Statement “to provide independent evidence directly to the public about the robustness of the existing regulatory regime” prompted Friends of the Earth to tweet, “£5 million #fracking propaganda fund shows Govt losing the argument on safety & regulations”.^{23,24}

This reveals an outdated adherence to the information deficit model of public engagement, which assumes that public mistrust is due simply to ignorance.²⁵ In reality, the reasons are more complicated. Management consultancy Futureye argues that four main drivers of outrage have led to the backlash: “feelings of lack of control, that industry does not respond to concerns, that the local people affected do not benefit, and that regulatory authorities can’t be trusted”.²⁶

Fracking also serves to highlight the consequences of failing to provide space for public debate. As with the decision on Heathrow’s third runway, ‘debate’ is taking the form of protest, as well as finding what space it can in the local planning system where, for the moment, decisions on fracking are still being made.

The 2008 Planning Act abolished public inquiries, in the context of major infrastructure projects, and introduced national policy statements (NPSs). They set out the government’s objectives for the development of nationally significant infrastructure in particular sectors. There are legal provisions for public consultation on NPSs, at the discretion of the secretary of state. In practice, government departments have fulfilled this duty through organising formal consultation processes based on wordy documents written in dry jargon. For example, the draft networks NPS (covering road and rail) ran to 88 pages plus 543 pages of supplementary appraisals.²⁷

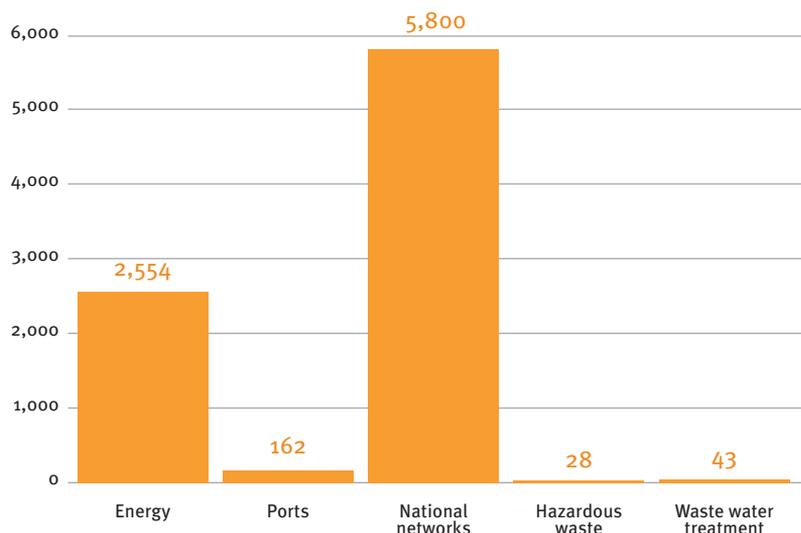
It is, therefore, not surprising that the consultation on offer has struggled to attract interest, except when NGOs have organised nationwide campaigns on specific asks. The graph below shows the number of responses to each NPS consultation.²⁸ Of the 5,800 responses received for the networks consultation, 95 per cent were standardised responses organised by the Campaign for Better Transport (CBT) and the Campaign to Protect Rural England (CPRE).²⁹ CBT mobilised its supporters to comment on the definition of 'national need' which it considered to be underpinned by inaccurate transport forecasts over estimating traffic growth, thus over estimating the need for road building.³⁰

The energy NPS consultation actually covered six separate NPSs, so the 2,554 responses averaged out at 425 per NPS. Almost half of the responses were driven by CPRE's postcard campaign calling for the undergrounding of all electricity lines.³¹

The opportunity to influence definitions of national infrastructure need via NPSs should not be a passive option, relying only on individual members of the public to keep track of consultations or NGOs to mount a campaign.³² The government must actively source public input into the NPSs. Not only will this help to avoid resentment later on, when the public becomes frustrated at the decisions that have already been made; it will also improve the quality of decision making. The volume of responses to the networks NPS led to revisions that explored upper and lower scenarios for future traffic growth and clarified that there is still an onus on local schemes to demonstrate need, rather than assuming that all road building will be beneficial. Openness, therefore, improved the policy overall.

“It makes sense to consider the implications of new infrastructure at a scale beyond local authority boundaries”

Number of responses to each NPS consultation



“Nowhere is there space for the public to participate in strategic, place-based discussions about where infrastructure should go”

The missing link between national and local

It makes sense to consider the implications of new infrastructure at a scale beyond local authority boundaries. A city’s transport network, for example, covers several unitary authorities. And a new electricity generation facility, such as an onshore wind farm sited in a rural district, could require a substation and new connections to the national grid to be built. This associated infrastructure is likely to span neighbouring districts. Of the nationally significant infrastructure projects (NSIPs) proposed since the 2008 Planning Act, even single site projects can be found straddling the boundary between two local authorities, and linear schemes, such as railways, run through multiple jurisdictions. The Thames Tideway Tunnel traverses 14.³³

National infrastructure policy is mostly quite abstract, with the details of implementation and the location of new infrastructure left to developers planning specific projects. After the national definitions of need, the next level down in the planning system is the much finer grain of local plans. These are supposed to be strategic and do involve public consultation, but they cover too small an area to consider infrastructure strategically. And local plans are not taken into account by the Planning Inspectorate when deciding whether to approve NSIPs.

Consequently, there is a significant gap between the national policy level and the project level. Nowhere is there space for the public to participate in strategic, place-based discussions about where infrastructure should go; the different ways in which needs could be met; and the trade-offs that such choices will involve.

These are the very questions the public is most interested in, but they rarely have the opportunity to engage, due to the gap highlighted. The most significant opportunities for improving the quality of major infrastructure planning and public engagement lie in the gap between the national and the local. In the next chapter we set out our recommendations for combined authority infrastructure plans and local infrastructure dialogues to address this.

3

Why the public should have a say



As demonstrated, there are real failings in the public engagement on offer around infrastructure. But what will be the benefits of improving it? There are a number of complementary rationales for investing in more meaningful public engagement:

Greater comprehension of risks and perspectives³⁴

Public engagement enables decision makers, experts and the public to challenge each other's assumptions. It also provides an opportunity to consider alternative perspectives and their merits, and to appreciate the dilemmas that policy makers face.³⁵ Similarly, engagement enhances public policy's potential for learning and evolution, helping to compensate for the limits of 'expert' knowledge found in political institutions.³⁶

New ideas enrich political debate

With more people involved, from a greater variety of backgrounds, there is more scope for new ideas to feed in. As John Stuart Mill pointed out long ago, the "collision of adverse opinions" is a process of getting closer to the truth.³⁷ The quality of the resulting decisions is, therefore, likely to improve.

Greater chance of identifying more acceptable outcomes

Deliberation creates new opportunities to identify potential compromises, and is likely to result in better policies with a greater chance of them being more widely acceptable.³⁸

“With more people involved, from a greater variety of backgrounds, there is more scope for new ideas to feed in”

More transparency and accountability improves legitimacy

Participation increases the public's trust in government and the perception that procedures are fair, which is an important influence on the public acceptance of decisions.^{39,40} Poorly constructed public consultations increase the public's suspicions about proposed projects.⁴¹ Sometimes reticence about new energy infrastructure may not be because people disagree with the change, but because they feel the change is being forced upon them through a process they are unable to influence.⁴²

Improved implementation

Effective public engagement tends to improve the implementation of decisions.⁴³ Thus, it can reduce the likelihood of developers facing costly delays late in the day, when opponents might otherwise resort to appeals, judicial reviews or civil disobedience. A recent report from the Institute for Government cites four cases in the UK where poor public engagement has caused delays, increased expense and led to inefficient outcomes: electricity generation, HS2, the Thames Tideway Tunnel and aviation in south east England.⁴⁴

Reduced development costs

The Armitt Review argued that reducing policy uncertainty could improve infrastructure affordability because it lowers the cost of capital due to greater investor confidence.⁴⁵ Uncertainty would be reduced further still if there was effective public engagement in infrastructure planning.

If the public pays, it should have a say

People are not only affected by new infrastructure developments; often, they are paying for them too, either as tax payers or as bill payers. It is, therefore, reasonable for them to have a say in infrastructure planning.

It's a right

Perhaps most fundamentally, the public has a right to participate in decisions as part of wider democratic society. The Aarhus Convention, which came into force in 2001, formalises this right in the specific case of decisions relating to the environment.⁴⁶

Public engagement will not remove controversy. There will always be unbridgeable gaps between different world views, between different ideas of social purpose or the common good, and between local interests and the government's definition of the national interest. Better engagement will not eliminate those gaps but it can narrow them, by creating space to explore alternative framings of the issue, providing room for greater understanding and compromise, and allowing alternative proposals to come to the fore.

“There is space for the public to have a greater say in decisions, without having ultimate responsibility for them”

The spectrum of engagement

Part of the challenge with public participation is that it means different things to different people. The approaches below represent a scale of increasing opportunity for the public to influence decisions.⁴⁷

- **Inform:** Provide the public with balanced and objective information to assist in understanding the problem, alternatives, opportunities and solutions.
- **Consult:** Obtain public feedback on analysis, alternatives and decisions.
- **Involve:** Work directly with the public throughout the process to ensure that concerns and aspirations are consistently understood and considered.
- **Collaborate:** Work in partnership with the public on each aspect of the decision, including the development of alternatives and the identification of the preferred solution.
- **Empower:** Place final decision making in the hands of the public.

The key to successful engagement is applying the appropriate kind of participation in a given situation.⁴⁸ With decisions about new infrastructure, the ‘consult’ mode has, unhelpfully, tended to be the dominant method used. Engagement occurs at the downstream end of the decision making process, when the question has already been framed, alternatives defined and technical specifications laid out. This limits the public’s opportunity for influence, with many people feeling that the important decisions have already been made.

The ‘involve’ mode is more transparent than consultation and begins further upstream, but has been regrettably absent from decision making processes relating to new infrastructure so far.

‘Collaborate’ and ‘empower’ may be appropriate locally, but infrastructure will continue to need national decision making and direction setting by elected representatives.

The spectrum outlined above shows that there is space for the public to have a greater say in decisions, without having ultimate responsibility for them.

4 A way forward



“The UK needs a national infrastructure strategy”

To deliver infrastructure that will provide social benefit and progress the low carbon transition, the three problems with current infrastructure planning, outlined in chapter two, have to be addressed.

We recommend two changes to infrastructure planning, each with an associated public engagement dimension essential to their success, and we propose a new institution to provide the required support and expertise:

- A strategic approach to infrastructure planning at national level, with a civil society advisory council
- Spatial planning at combined authority level, informed by local infrastructure dialogues
- A new body to act as an impartial facilitator of public engagement

Strategic national infrastructure planning

A national infrastructure strategy

The UK needs a national infrastructure strategy. National policy statements would nest under this overarching strategy, and guidance would be issued to local authorities based on the national strategy, to inform local plans.

Such a strategy would:

- be underpinned by an evidence based assessment of needs, taking into account projections of economic growth, population, and technological and environmental change, with clear plans to meet those needs;⁴⁹
- take a long term perspective, looking to the next 25-30 years, but with monitoring and review to keep the strategy up to date;
- consider demand side together with supply side options;
- fit within the constraints of the carbon budgets adopted by the government;
- have some broadly spatial elements; for example, it might indicate the need for port upgrades in certain parts of the country;
- cover all infrastructure sectors; and
- be informed by the recommendations of a civil society advisory council.

There are already moves in this direction. The coalition government is trying to improve along these lines, with the National Infrastructure Plan. Infrastructure UK insists that the latest version is a strategic plan and not just a list of projects, which was how the Public Accounts Committee described the 2013 edition.^{50,51}

The Armitt Review, endorsed by the Labour Party, recommends creating an independent National Infrastructure Commission to carry out a national infrastructure assessment, underpinned by delivery plans. A number of other recent independent reports echo this approach.⁵²

“Strategic planning, accompanied by public dialogue, is needed at the combined authority level to fill the gap between national policy and project delivery”

A civil society advisory council

Public input is vital at the national level, because this is where the question of need is decided and where the dominant framings of problems occur.⁵³ National policy also provides the context for planning at sub-national levels. However, as we saw with the NPSs, national policy discussions are fairly abstract and don't ignite public interest in the same way that concrete proposals do.⁵⁴ Securing input should not have to rely on the variable ability of NGOs to respond quickly and mount a campaign. But equally, seeking direct deliberation with individual citizens might not be the ideal way to ensure public involvement.

To address this, we recommend tapping the richness of civil society by seeking input from a representative advisory council, as a formal part of the decision making process. The council must include a diverse set of interests, such as trade unions, conservation organisations and consumer groups. The council's members would be able to provide insight into which outcomes are most valued by the people they represent or work with. Each organisation represented on the council would be responsible for mobilising engagement and discussion with its members and stakeholders.

The council would carry out its activities and meetings in a highly transparent manner: for example, transcripts or videos of its meetings would be publicly available, so that people outside the room can hold their representatives to account.

Many civil society groups, like the National Trust and the Women's Institutes, are highly trusted by the public. While such organisations might be wary of participating in a council with such a diverse set of members, the transparency of the process would allow each member to show they have accurately represented their organisation's perspective, regardless of the final decisions.

If a National Infrastructure Commission is set up, the civil society council would advise it. If the institutional structure of the planning system remains the same, an infrastructure council should be established to advise departments on writing NPSs.

Spatial planning at combined authority level

Combined authority infrastructure planning

Strategic planning, accompanied by public dialogue, is needed at the combined authority level to fill the gap between national policy and project delivery. As momentum builds behind devolution, with more funding devolved to city and county regions for policy areas such as transport, we expect to see more combined authorities take shape.⁵⁵

This is an ideal scale at which to undertake infrastructure planning, filling the gap between abstract national policies and finer grained local planning. As combined authorities form, we would expect them to produce infrastructure plans as part of their devolution settlement and for these to be informed by local dialogues. Rather than abruptly imposing a new layer

of planning, an evolutionary approach would be sensible, encouraging local authorities to work together in combinations that make sense, such as functional economic areas.

Greater Manchester has already begun to move in this direction, producing a draft of a statutory Development Plan Document, developed jointly by all councils within the city region, but to be adopted individually by each council in its role as a planning authority.⁵⁶

“Relating infrastructure proposals to their surroundings is a tangible way of considering the implications of policy”

Combined authority infrastructure plans would be spatial and they would integrate different infrastructure sectors, enabling local decision makers to consider the cumulative implications of different types of infrastructure. The plans would be high level, indicating areas in need of, or suitable for, particular large scale infrastructure, such as an onshore wind farm or a new railway station (as an example, see the Aberdeen City and Shire Strategic Development Plan overleaf). They would also indicate places that are especially valued locally for being infrastructure-free.

Strategic plans at combined authority level would influence more detailed local plans, which would determine site boundaries and smaller scale infrastructure. This would enable wider assessment of decentralised infrastructure provision, as nationally significant infrastructure can be considered alongside smaller scale projects and demand side measures, such as energy efficiency building retrofit.

Local infrastructure dialogues

Local dialogues must inform combined authority infrastructure planning. These will be an essential part of enabling public debate about infrastructure planning, occurring at a point where meaningful input is possible and the questions that most interest people are still on the table. They will also have a key role in informing the national infrastructure planning process.

Discussions would be grounded in the relevant place, which is vital because relating infrastructure proposals to their surroundings is a tangible way of considering the implications of policy. It is easier to engage the public at this scale than with more abstract questions of national policy, and is likely to lead to a richer debate. Communities would have space to discuss the outcomes made possible by different types of infrastructure, the best places to locate it and the investments that different members of society will value.

The decision making process at this scale must keep open a path for alternative choices.⁵⁷ When the public is presented with a single option and asked to respond “yes” or “no” to an already detailed plan, the inclination is often to say “no”. This is because it doesn’t seem like much of a choice at that stage, and the plan is unlikely to be properly attuned to local wishes if no serious engagement has taken place. This can give developers the impression that engagement just provides an opportunity for people to object. Yet, if people are presented with a set of options and the ability to offer their own suggestions, it becomes possible to express views more like

“I prefer that one to that one” or “I value what that one will make possible”, and a more constructive dialogue can follow.

The result would be a more strategic, effective and democratic planning system that has greater public support for the resulting infrastructure projects. Developers would be offered clearer indications as to which types of infrastructure are needed, and the most appropriate locations. This process would reduce the risk of protracted wrangling at the project stage, thus providing more certainty for businesses and investors.

Strategic plans in Scotland

Scotland has already made significant progress towards the kind of combined authority infrastructure planning we recommend. It has four city region plans, called strategic development plans (SDPs), for Aberdeen, Dundee-Perth, Edinburgh and Glasgow.⁵⁸ The plans include spatial strategies and they cover issues that cross local authority boundaries, such as housing and transport. The plans are developed and administered by strategic development planning authorities, which are jointly funded by the relevant local authorities.⁵⁹ Scotland also has local plans, as in England, but the city region plans sit above them.

A review of the SDPs, commissioned by the Scottish Government, found that a spatial approach to infrastructure planning is beneficial and that its value would be increased by including consideration of transport, energy and waste at the city region level, in a broader “placemaking approach to areas of major change”. The reviewers also argued that the government should hold public hearings as part of the process of examining SDPs. Despite this requiring more resources and appearing to run counter to the aim of streamlining the planning system, the authors make the case for public engagement, suggesting that hearings would be “an important opportunity to raise concerns and build confidence in the strategic planning system”.⁶⁰

Key diagram from the Aberdeen City and Shire Strategic Development Plan (2014).⁶¹

- Spatial concept 
- Strategic growth 
- Local growth 
- Regeneration 

- Projects**
- Movement 
- Green 
- Place 
- Infrastructure 

- Housing market area 



“Engagement must be resourced appropriately if it is to be effective and worthwhile”

Engagement capacity

These recommendations demand a significant increase in public engagement related to infrastructure planning. To provide that capacity, we propose the creation of an independent body, which we have given the working title of Citizen Voice, to be an impartial facilitator and a well resourced source of engagement expertise. It would have a critical role in facilitating a rich debate around the identification of need and strategic direction at national and sub-national level.

The body would facilitate the activities of the civil society advisory council and be available as a resource for local authorities to assist with local infrastructure dialogues. Engagement expertise would be concentrated within the organisation and it would employ deliberative tools, constantly innovating, and using social media and gamification to involve different sections of society. Spanning national to local arenas, Citizen Voice would be able to promote iteration between conversations at different scales, ensuring that lessons learned at the local level informed decisions at the national level and vice versa. An annual report could function as a vehicle for this iterative work.

At the local level, Citizen Voice would be available to organise and facilitate dialogue about the combined authority infrastructure planning, ensuring that every local resident in the relevant area has the opportunity to be heard. Citizen Voice should actively create forums for representative cross sections of the communities to deliberate, including those who wouldn't usually get involved, with monetary compensation available for those who participate in time consuming processes, such as focus groups. As well as direct deliberation with local residents, a range of stakeholders would have to be involved, including developers, planning authorities, Local Enterprise Partnerships, Local Nature Partnerships, academics, green groups and consumer groups.

Citizen Voice would ensure that a diverse range of considered views is presented to decision makers. Its activities would be transparent, helping to make it a trustworthy intermediary, with no agenda beyond facilitating dialogue. Experts agree that trusted and independent agents carry out engagement most effectively.⁶²

Citizen Voice itself would not have decision making responsibility. But decision makers would be obliged to take note of Citizen Voice's findings and publish a response, without having to act on the views expressed by the public during its activities.

Engagement must be resourced appropriately if it is to be effective and worthwhile.⁶³ Citizen Voice could be funded by general taxation, or by fees paid by developers. Under the current institutional arrangement, we recommend that it comes under the Cabinet Office, because it will have to engage with multiple departments including the Department for Communities and Local Government, Department for Transport, and Department of Energy and Climate Change.

An effective public forum: Commission nationale du débat public

France's national commission for public debate (CNDP) was created in 1995 in response to citizen activism which was obstructing big developers in getting their plans approved. France copied a system originally developed in Quebec, Canada.

Public engagement procedures must be used for large projects above certain thresholds (similar to the definition of NSIPs in the UK's 2008 Planning Act) and the CNDP provides an instructive example for the UK.

Two important aspects are worth mentioning. First, the CNDP is well resourced, so all participants are given equal support to draw up and publish their arguments and participate in discussions. Second, the CNDP is not a decision making body; its role is to produce a report after a four month public debate process. The developer then decides whether to push ahead with the scheme or to modify or abandon it.

A third of cases up to 2009 were dropped or extensively modified. For example, developers proposing a new rail link, between Charles de Gaulle Airport and the centre of Paris, ended up adopting their opponents' alternative proposal. The president of each project commission monitors developers' promises to ensure accountability, and this helps to build trust and legitimacy.⁶⁴



5

What would change as
a result of our
recommendations?

“The great advantage of this model for local authorities is that it provides the flexibility to decarbonise in a locally appropriate way”

These recommendations, encapsulated in the diagram on page four, could work iteratively. For example, the first national strategy could be non-statutory, having the status of a ‘material consideration’ for planning decisions. Once the local infrastructure dialogues have a chance to get going, their outputs could feed into the next iteration of the national strategy, which could eventually become statutory. The strategy would be reviewed whenever the results of the ongoing monitoring (by the National Infrastructure Commission or the Planning Inspectorate) suggest a review is needed. We have deliberately omitted the institution responsible for producing the national infrastructure strategy, because it will differ depending on the outcome of the general election.

What changes as a result of our recommendations, and what remains the same?

National level

- A civil society advisory council would exist to inform national infrastructure planning. It would either inform the existing process of developing NPSs and National Infrastructure Plans or, if such a body is created, it would advise the National Infrastructure Commission.
- Elected representatives would remain the final decision makers: the national infrastructure strategy must be approved by parliament.

Local level

- There would be a new layer of strategic planning at combined authority level, sitting between national policy and local plans. Our recommendations fit with the trend towards the formation of combined authorities, requiring the development of a strategic infrastructure plan as part of the combination process.
- Combined authorities would be required to run local infrastructure dialogues, as part of their plan development. While these would be time intensive, the resources and expertise provided by Citizen Voice would ease the burden.
- In the absence of a combined authority in a given area, authorities designing local plans would have to take the national strategy into account.
- The rest of the town and country planning process would remain the same.
- The great advantage of this model for local authorities is that it provides the flexibility to decarbonise in a locally appropriate way, in negotiation with national government, to make sure that local decisions do not undermine the UK’s ability to achieve its carbon budgets. A county region would be able to oppose a particular technology, such as onshore wind, as long as the combined authority could demonstrate that it was promoting other green technologies instead.

Infrastructure developers

- There would not be major changes to the process of applying for planning permission or development consent orders.
- Developers would begin the process with greater clarity about how the public would respond during consultations, by referring to the outcomes of local infrastructure dialogues.
- Developers proposing NSIPs would have to consider their project in light of the national strategy as well as the NPS. This would add an overarching layer to the national infrastructure planning process, but would give greater clarity to developers about where particular projects are needed and where they are likely to be more acceptable.
- Better strategic planning and improved public engagement will lead to better designed projects, which are more likely to succeed because they would be more locally appropriate and of higher quality. This should cut out time spent by developers on scoping, appeals, judicial review and time spent by the secretary of state 'calling in'.



6 Conclusion

“The pressing need is to build the government’s trust in the public’s ability to understand the country’s problems and participate in designing the solutions”

There is no perfect way to organise public participation in decisions about the UK’s infrastructure. The best approach is to feel the way forward, gradually revising the system and evaluating each step. The context is constantly evolving: technologies emerge and develop, new means of communication take hold and geopolitical configurations change, as we have seen with the unfolding devolution agenda.

The recommendations presented here are only part of the answer to the fundamental problems we have outlined. Major blocks to better public engagement will also be political and institutional inertia, with a desire to cling to a more technocratic status quo. Altering institutional structures will not be sufficient in the face of this: ultimately, a new culture of deliberative engagement is needed within the British political system.

In infrastructure circles, there is often talk about how to build the public’s trust in industry and government. But perhaps a wary, sceptical public is a good thing for democracy, and the pressing need is to build the government’s trust in the public’s ability to understand the country’s problems and participate in designing the solutions.

Endnotes

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Green Alliance
36 Buckingham Palace Road
London SW1W 0RE
020 7233 7433

ga@green-alliance.org.uk
www.green-alliance.org.uk
blog: greenallianceblog.org.uk
twitter: @GreenAllianceUK

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