

Meeting the housing needs of BAME households in England: the role of the planning system

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Acronym List

BAME	Black, Asian and Minority Ethnic
CIL	Community infrastructure levy
CPO	Compulsory purchase order
CRE	Commission for Racial Equality (1976-2007)
EDI	Equality, diversity and inclusion
EHRC	Equality and Human Rights Commission (2007-present)
EqIA	Equality impact assessment
EU	European Union
GLA	Greater London Authority
GLC	Greater London Council (1965-1986)
GTAA	Gypsy and Traveller accommodation assessment
MHCLG	Ministry of Housing, Communities and Local Government
NP	Neighbourhood planning
NPPF	National Planning Policy Framework
ODPM	Office of the Deputy Prime Minister (2001-2006)
ONS	Office for National Statistics
PPG	Planning practice guidance (post-2012)
PRS	Private rented sector
PSED	Public sector equality duty
RTPI	Royal Town Planning Institute
SHMA	Strategic housing market assessment
TCPA	Town and Country Planning Association

1. Racial inequalities, housing and planning

Research has demonstrated that Black and Minority Ethnic (BAME) groups in the UK face stark and persistent social and economic inequality (EHRC, 2016; Khan, 2020). Across Britain, BAME groups are almost twice as likely to live in poverty compared to white people; they also experience disproportionately high unemployment rates and are more likely to work in more insecure forms of employment (EHRC, 2016). In the judicial system, rates of prosecution and sentencing for Black people in England and Wales are three times higher than for white people (ibid) and in healthcare, ONS data showed that “all ethnic groups other than Chinese females were at higher risk of COVID-19 mortality than the White ethnic population” (ONS, 2020a, para.5).

The proportion of the British public who describe themselves as “very” or “a little” racially prejudiced has not fallen below 25% since the reported survey began in 1983 (Kelley et al., 2017). Moreover, race remains the most commonly recorded motivation for hate crime in England and Wales, at 82% (EHRC, 2016). The continuing existence of racial prejudice in Britain is noteworthy as “a significant body of evidence suggests that even subtle racial prejudices contribute directly to racial inequalities” (Kelley et al., 2017, p.11).

In May 2020, the murder of George Floyd by a US police officer was followed by organised demonstrations across the US and internationally against the continued existence of racism and racial inequalities. In response, the UK Government established the Commission on Race and Ethnic Disparities to investigate disparities between ethnic groups in Britain. The resulting ‘Sewell Report’, published in March 2021, acknowledged that “overt and outright racism persists in the UK” (p.29); however, it denied the existence of institutional racism. The report’s conclusions were widely contested by organisations, individuals, and all the major political opposition parties. The Runnymede Trust contended that “the report...is a script that has been written for 10 Downing Street. The people involved...had no interest in genuinely discussing racism...” (March 2021, para.1). The United Nations also moved to condemn the findings (UNHRC, 2021).

In contrast to the Sewell report, Khan et al. (2014) stress that the inequalities between ethnic groups which persist across society are not disappearing, and will not disappear, of their own accord; they argue that “local and national policymakers and politicians must respond much more directly to ethnic inequalities” (p.4) and stress that particular attention needs to be paid to the domain of housing in policymaking.

Racial disparities in housing

1.6 million households in England are estimated to be in need of social housing – 1.16 million more than recorded on official waiting lists (National Housing Federation, 2020). This problem is compounded for BAME communities, as they experience significantly greater levels of housing need (Gulliver, 2016) and homelessness (Bramley & Fitzpatrick, 2018), and are more likely to live in poor-quality or overcrowded accommodation (McFarlane, 2014; Gulliver, 2016; Haque, Becares & Treloar, 2020). Moreover, studies have shown that BAME households “face additional barriers in entering [the social housing sector] and are more likely to be funneled into the lowest quality and least desirable properties due to various constraints on their housing choices” (Kowalewska, 2018, p.7). Particular issues may include the existence of local allocations policies prioritising employment or local connections, as “BME households are more likely than white households to be out of work and be migrants” (ibid, p.9).

Difficulties associated with accessing social housing and the high initial costs required to become a homeowner mean that it is now common for households on low incomes to be reliant on an expensive private rental sector (Bailey, 2020). This can be a particular problem for BAME communities as a recent report found that BAME families were between two and three times more likely to be in persistent poverty than white households (Social Metrics Commission, 2020).

Khan (2020) argues that racial discrimination, like poverty, is a social determinant of health. The COVID-19 pandemic has caused a disproportionate number of deaths amongst BAME groups, which may partly be explained by the interrelationship between COVID-19 and other structural health inequalities (Bambra et al., 2019; Farah & Saddler, 2020).

Interviewees in research for the NHS Confederation concurred that “despite the wealth of data collected by the national bodies...on the relationship between health, inequalities and BME communities, the NHS and government had not taken sufficient action to address the underlying issues” (Farah & Saddler, 2020, p.4).

A study by the Runnymede Trust concluded that one such underlying issue was housing conditions, as BAME individuals were found to be more likely to live in overcrowded households (which are in turn more likely to be multigenerational), making it difficult to shield or self-isolate as advised (Haque, Becares & Treloar, 2020). Moreover, the location of housing was found to increase individual risk, with COVID-19 more prevalent in urban areas with larger and denser populations, and BAME communities more likely to live in larger cities (Platt & Warwick, 2020).

In short, BAME groups continue to face discrimination and inequality in the housing domain; they must overcome additional barriers to access social housing despite being more likely than white individuals to experience housing and homelessness need, and are also disproportionately impacted by ever-increasing costs in the private rental sector. BAME individuals are less likely to own their own homes, more likely to live in overcrowded housing, more likely to reside in low-quality accommodation, and more likely to face statutory homelessness than their white counterparts.

The potential role of planning

Planning in the UK has a historical relationship with housing improvements, as the modern system developed out of early public health movements seeking to improve sanitary conditions in nineteenth-century cities following rapid industrialization (Cullingworth et al., 2015). Today the English planning system remains centered around the regulation of land uses, and it is through the planning system that housing is delivered; this therefore makes planning highly relevant in a discussion of racial inequalities in housing.

Since the 1990s there has also been a relative shift away from traditional land-use planning towards ‘spatial planning’ and ‘placemaking’, which integrate more social considerations into physical development planning (Adams & Tiesdell, 2013; RTPI, 2014). It is thus now recognised that the spatial relationship of housing developments to other infrastructure and services such as shops, schools, and green spaces can impact on broader socioeconomic outcomes for residents (RTPI, 2014).

The most recent planning White Paper, *Planning for the Future* (MHCLG, 2020a) outlines the Government’s proposals for planning reform, which aim to make it quicker and easier to deliver new, affordable homes without forfeiting design quality. However, planners and campaigners are apprehensive about plans to scrap Section 106 agreements and community infrastructure levies (CIL) as these are two key mechanisms used by local authorities to exploit planning gains from major developers, respectively in the form of affordable housing or infrastructure such as parks or schools. Whilst there is recognition that current mechanisms could be improved, the concern is that it remains unclear how the planning system will deliver the equivalent amount of social and affordable housing (and this is already a limited amount) under the proposed reforms (RTPI, 2020a; Shelter, 2020b; TCPA, 2020). Shelter (2020b) further point out that any loss of social housing arising from the purported changes would disproportionately impact BAME households.

Whilst it can be argued that the purpose of planning still encompasses broad social aims, including improving the health and wellbeing of residents, the historical attempts of the UK planning system to pursue these through a lens of racial equality have often been short-lived and ineffective (Gale & Thomas, 2020). The ability of the planning system to promote racial equality in policy domains such as housing thus remains uncertain, and this report will seek to update the existing knowledge base on this topic by investigating whether any positive progress can be discerned or if planning is still failing to maximise its contribution to addressing this form of social injustice.

Research aim & questions

The aim of this research is to investigate the current and potential contribution of the English planning system to addressing racial inequalities in housing and meeting the particular housing needs of BAME households.

In pursuing this research aim, the following three research questions are addressed:

RQ1. To what extent, if at all, is reducing racial inequality in housing and meeting the housing needs of BAME groups prioritised in planning policy and practice? What local and other factors influence the priority given to these issues?

RQ2. Could a reformed planning system improve local authorities' ability to address racial inequality in housing and in meeting the housing needs of BAME groups?

RQ3. What other mechanisms, beyond the planning system, work to constrain its ability to reduce racial inequality in housing and meet the housing needs of BAME groups? What might be done to address these barriers and maximise planning's contribution to this agenda?

Structure of report

This report will now go on to outline the research methodology in Chapter 2, before reviewing the current literature on this topic in Chapter 3. Research results drawing on national key informant interviews and local case studies will then be presented in Chapters 4 and 5 respectively. Finally, Chapter 6 will draw together the conclusions of the research and make recommendations for policy and practice change.

2. Research Methods

A qualitative research methodology comprising three phases was adopted in this study. First, a literature review was undertaken; second, key informant interviews were conducted with stakeholders working in planning, housing and inequalities; third, three case studies of local planning authorities were conducted.

Literature review

The first step in the research was to ascertain how the planning system may realistically seek to address racial inequalities in housing and meet BAME housing needs, and what evidence already exists on its contribution in this regard. A literature review was therefore undertaken to establish the historical and current functioning of the planning system, and how this has intersected with attempts to address racial inequalities. Relevant reports and academic literature were sourced via the university library database as well as online databases of academic material including Mendeley and Google Scholar. Sources were also recommended by project supervisors and research advisory group members. The reference lists of sources identified in the early stages were then also used to snowball and broaden the literature base. The literature was then analysed thematically; see Chapter 3 for the outcome of this review.

Key informant interviews

Parsons (2008) states that key informant interviews “have a useful role, especially at the beginning stages of research studies when information gathering and hypothesis building are the goal” (para.2). In this study, key informant interviews offered insight into the broader policy context in which this research fits, and in particular the relative importance or weight afforded to planning as compared with other potential levers for intervening to address racial inequalities in housing.

Interviews were conducted with eight key informants working in the sectors of planning, housing or inequalities. Participants were chosen due to their expertise in the aforementioned fields and, where possible, selected on the basis that they could offer a national overview of patterns with respect to relevant aspects of local authority activities and performance. Participants were mostly sampled via existing contacts, though some were contacted using information publicly available in a professional context. Interviews were conducted online using video conferencing facilities and the topic guide ranged across all of the research questions posed in the study (see Appendix 1).

Both sound and video were recorded for all participants. Informed consent was sought from all participants prior to interview by means of a signed consent form, and was also confirmed again on the recording before the interview began. The recorded interviews were then fully transcribed and thematically analysed in order to answer the research questions posed.

Case studies

Selecting case studies

Undertaking local authority case studies was determined to be a particularly appropriate approach to deploy in this study as planning is an inherently spatial activity and therefore it is important to discern how policy manifests itself in different settings (MacCallum, Babb & Curtis, 2019). Each ‘case’ in a case study research design is an object of interest in its own right and should be examined in depth (Bryman, 2016). However, a comparative case study was chosen for this research as “we can often understand social phenomena better when they are compared in relation to two or more meaningfully contrasting cases or situations” (ibid, p.65).

Cases for comparison can be selected on the basis of ‘maximising similarity’ or on the basis of ‘maximising difference’, depending on the aims of the research. For the purposes of this research, cases were sampled to maximise the difference between the areas of study in order to capture the greatest possible variety of experiences. This was felt to be important

as ethnic minorities are heterogeneous groups, and varying housing market pressures and other contextual factors also shape what the most pressing issues are with regard to racial inequalities in housing.

Three contrasting case study areas were therefore chosen for comparative analysis (though a fourth was then added, as noted below). The key factors taken into account in selecting these case studies were:

- geographical location (London v non-London);
- housing market context (high v lower demand areas);
- demographics (size and profile of BAME population);
- political complexion
- any evidence of progressive policy with regard to BAME housing issues

Cutting across all of this selection process was an acute awareness that London has a number of specific features that are of particular relevance to this research. London is the most diverse region in England and Wales: 40.2% of residents identified with either the Asian, Black or Mixed Other group in the 2011 census, and there are 14 London boroughs where the population of non-white residents exceeds 40%, ranging from a 41.7% non-white population in Barking and Dagenham to a 71% non-white population in Newham (ONS, 2018). At the same time, London, the UK's capital city, has a much stronger economy compared to other regional centres (Romei, 2019), but also has a combination of high housing pressures and high levels of poverty which is unique to the city and causing it to become increasingly polarised (Mayor of London, 2016). Moreover, planning authorities in Greater London must shape their local policies based on the current London Plan, published by the Mayor of London/Greater London Authority.

Therefore, it was decided that two of the three case study areas would be located in London, with these two areas chosen on the basis of maximising the difference between them within the London context. The selected areas were the London Borough of Lambeth and the London Borough of Harrow. This enabled the study to capture one inner-London borough that has a very high population density and is experiencing high housing demand, and is also home to a large proportion of black residents (Lambeth). This was compared against a second outer-London borough, with a more mixed housing demand profile and a more mixed local political landscape, as well as a greater emphasis on the needs of the resident South Asian community (Harrow). After the research started, it was decided to extend fieldwork in London to include Lewisham due to initial difficulties contacting potential participants in Lambeth and Harrow. Lewisham is an inner-London borough that displays some similarities with Lambeth in terms of its demographics and tenure mix profile. This choice is further explained in the "fieldwork in case studies" section of this chapter.

Whilst the uniqueness and dominance of London compared to other regional centres makes it a vital location for this research, it was also important to select a non-London case study in order to capture the very different issues and pressures associated with racial inequalities in housing that may arise elsewhere. The city of Bradford was chosen as the third case study for this comparison as it represents an urban area outside of London with a high proportion of BAME groups, and a large South Asian community in particular. The district has a much lower population density than the London boroughs and also contains a mix of urban and rural areas; homeownership is also higher than in the London boroughs.

The table provided in Appendix 3 gives contextual information on all four case study areas using relevant available data relating to property prices, local incomes, and population demographics.

Fieldwork in the case studies

Within each case study, participants were sampled from existing contacts and snowball sampling was then applied to capture the range of professional perspectives that were relevant to the research. In total, interviews with 17 participants were conducted across the case studies, including: 7 in Bradford, 6 in Harrow, 3 in Lambeth and 1 in Lewisham.

In Bradford, the 7 participants were sampled from across the planning and housing departments of the metropolitan district council, as well as from two local housing associations.

Initially, sampling participants in both the selected London boroughs proved very difficult, and persistent attempts to follow up contacts failed to materialise into interviews for a protracted period. A decision was therefore made to open up the sample to relevant stakeholders working in any of the London boroughs with the view to completing a broader city-wide case study. Subsequent to this, two stakeholders from Lambeth borough council were secured for participation, along with one academic with a particular interest in Lambeth. One further participant was sampled from Lewisham borough council.

Later on in the case study phase of the research, a subsequent increase in interest from contacts in Harrow meant that 6 participants were then sampled from this case study area, including 4 from the borough council (from the planning and housing departments) and 2 from a local advocacy organisation. It was therefore decided that this sample size was large enough to stick with a local case study approach in London, alongside the smaller samples from Lambeth and Lewisham.

The topic guide used in case study interviews concentrated on identifying the focus (or lack of focus) on the needs of BAME groups within local planning and housing strategies, as well as building up a picture of the local context which may affect this focus. Questions were centered around whether there were any tools within the current planning and housing systems that could be used to try and reduce racial inequality in housing and whether any potential improvement of such tools would be viewed as positive. The topic guide was tailored for the different professionals interviewed, for example planners were asked about how these issues relate to planning policies, whilst housing staff were respectively questioned on housing policies (see Appendix 2 for the core case study topic guide).

Both sound and video were recorded for all participants. Informed consent was sought from all participants prior to interview by means of a signed consent form, and was also confirmed again on the record before the interview began. The recorded interviews were then fully transcribed and thematically analysed.

There had been an ambition to interview community groups as part of the study, but ultimately this did not prove possible. Due to the initial problems with contacting potential participants in case study areas for key informant interviews, especially in London, this stage of the research took significantly longer than planned. Furthermore, a lack of existing contacts (in the London boroughs in particular) also precluded prior knowledge of community groups in the areas. Contacting community groups for this study without a 'warm introduction' from existing contacts would have posed both practical and, potentially, ethical issues, particularly with the ongoing COVID-19 restrictions meaning that any focus group discussions would have had to be conducted online.

3. The planning system

Introduction and Structure

This chapter will review existing research and literature relevant to the study's research questions. First, it will consider the function and role of the English planning system, arguing that planning has historically tended to be socially conservative in its outcomes and that limited efforts to change this have been hampered by cuts to local authority funding and influence. Second, past attempts by the planning profession to consider how their policy and practices may relate to racial inequalities will then be discussed. Third, the current planning policy relevant for assessing the housing needs of BAME groups is outlined. Finally, the chapter will conclude by considering the current planning and development context in which local authorities would be seeking to meet this need.

The function of the English planning system

The English planning system in its modern form was established under the 1947 Town and Country Planning Act, which nationalised the development of land by making it subject to planning permissions (Cullingworth et al., 2015). Despite its early social functions, which grew from the need to tackle social ills such as overcrowding and poor sanitation, modern planning has never sought to pursue major social reform, particularly within a wider context of growing cuts to local authority funding and influence.

Social conservatism

It has been argued that the British planning system has been socially conservative since it was adopted in its modern form in 1947 (Thomas and Krishnarayan, 1994a) and that it has since failed to question, and therefore reinforced, existing balances of power (Lewis & Foord, 1984; Healey et al., 1988). Despite its public health origins, linked to efforts to improve living conditions in newly-industrialised cities, Thomas and Krishnarayan (1994) argue that "planning as a state activity was not introduced and has not been maintained in order to create some kind of new society or radical social reform" (p.1893) and that the trajectory of state planning has "tended to focus on legal and technical aspects of land use development and has not involved persistent and wide-ranging debates about the social purposes and goals of planning" (ibid). Other literature has since agreed that the social function of town planning has usually tended to play second fiddle to its environmental concerns (Greed, 2005; Reeves, 2005).

This social conservatism within planning has consequences for all minority groups, however these vary (Thomas and Krishnarayan, 1994). Odeleye and Horwood (2020) argue that "planning has prioritised some needs over others, resulting in places that do not meet the needs of all" (p.26). Numerous studies suggest that over time the planning profession has struggled to relate social factors such as gender, race, age and disability to spatial planning and land use (Ellis, 2000; Greed, 2005; Reeves, 2005; Wood, Bornat & Biquelet-Lock, 2019); some recent progress has occurred in including guidance on disability planning in policy documents, however Booth et al. (2004) found that understanding amongst planners is often limited to basic responses, e.g. ensuring wheelchair access to public buildings. Similarly, though a Gender Mainstreaming Toolkit was developed in 2003 to ensure that planners were considering issues of gender when developing and implementing policy (Reeves et al., 2003), Odeleye and Horwood (2020) argue that these issues remain pertinent today. In Greed's view (2016), "[p]lanners have difficulty dealing with aspatial (social, cultural, non-land-use) matters in general and find it hard to integrate high-level conceptual issues, such as sustainability, faith and gender equality, into urban governance procedures, let alone link them together" (p.157).

From a racial equality perspective, it has been argued that planning policies that seek to preserve the prescribed "special character" of places, such as urban containment and rural conservation, have led to a certain rural 'traditional Englishness' being favoured in the assessment of development proposals (Hall et al., 1973; Thomas, 1994; 2000). Thomas (1994) thus contends that planning "can plausibly be portrayed as unwittingly bolstering a view of Englishness which is inherently racist" (p.354) and Beebeejaun (2004) has similarly argued that these policies have positioned ethnic minority groups as contrasting with a perceived 'British way of life'. Writing in 2020, Beebeejaun and Chapman assert that "planning

must address the makings of BAME inequalities in the UK, not least because it bears some responsibility for their creation” (2020, p.30).

Various criticisms have also been levelled at public engagement and consultation processes within the planning system. Local planning authorities are required to adhere to a statutory consultation period for planning applications and take account of any comments submitted by the public (MHCLG, 2019). Some argue that these processes are democratic as they provide an opportunity for the public to voice their views on planning matters and influence decision-making, therefore addressing power imbalances (Healey, 1997; Lane, 2005). However, there are also strong arguments that the appearance of a democratic process actually continues to amplify the voices within society that already hold power of some kind, and have the time, knowledge and resources take up opportunities to engage in planning matters (Forester, 1989; Flyvbjerg, 1998; Fainstein, 2000). Bebeejaun (2004; 2006; 2012) has written extensively about the issues surrounding the involvement of ethnic minority groups in planning processes, and she challenges the group-based identity ascribed to minority communities, the labelling of these groups by professionals as “hard-to-reach”, and what she describes as a lack of nuanced understanding of how to engage these groups effectively. She further argues that: “there is no clear link-up between initial participatory discussions involving ethnic minorities and concrete inclusion of their views and opinions in either the policy or the built environments... Approaches that treat participation as a “sticking plaster” solution do not tackle the deeply embedded prejudices that continue to influence urban policy at a deep level” (Beebeejaun, 2012, p.546).

Moreover, the 2011 Localism Act introduced the concept of neighbourhood planning (NP) in England, aiming to “[give] communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area” (MHCLG, 2020, para.1). However, NP has been associated with varying uptake in different geographical contexts (Brownill & Bradley, 2017); a recent report to the MHCLG found that “the overall picture of take-up of NP is biased towards parished, rural areas” and also that “the majority of the [local planning authorities] with no NP activity are located in urban areas (Parker et al., 2020, pp.11-12). Despite these issues, the Government is encouraging the expansion of NP across the country, and in 2021 £2.4 million was allocated to try and address the low uptake of NP in poorer urban communities and to support greater diversity (MHCLG, 2021). However, patterns of local involvement thus far suggest the danger remains that this new form of plan-making will be another mechanism of the planning system which reinforces existing power relationships.

The 2018 Raynsford Review of Planning in England concluded that “there remains deep concern that planning no longer delivers for people [and] that today’s planning system is not fit for purpose in securing lasting progress on key aspects of the economy, in meeting housing needs, in tackling climate change, or in mitigating the current stark inequalities between the regions of England” (TCPA, 2018, p.6).

Changes to local government

Having argued that planning policy and practice has historically led to socially conservative outcomes, the ability of local authorities to influence such outcomes will now be considered. Shortly after the introduction of the 1976 Race Relations Act, race and anti-racism initiatives were on the agenda for some local authorities (Solomos, 1993); however, in the absence of any clear national guidance on equality policies under the successive Conservative governments of the 1980s and 1990s (Thornley, 1991), the very limited challenges to planning’s social conservatism usually came from left-wing, inner-city authorities that had developed some race equality policies, (Ouseley, 1984; 1990). The Greater London Council also published its own ‘race and planning guidelines’ in 1985 (GLC, 1985; Thomas & Krishnarayan, 1994a).

During these years of Conservative government, local authorities experienced a major scale-back of their funding and influence, and there was a much greater focus on privatisation and so-called ‘property-led’ or ‘market-led’ approaches to urban policy. The idea behind such approaches is generally that investing in the speculative development or renovation of prime property will in turn stimulate local markets and result in economic growth to the benefit of residents; however, unevenness between different regions and social groups increased, with less affluent places and people losing out

(Parkinson, 1989). Thomas (2008) argues that “[t]he Conservative governments’ focus on ‘top-down’ property-led regeneration in the 1980s and well into the 1990s was particularly inimical to righting racial, or indeed any other kind of injustice” (p.9). Alongside this, there was a dramatic reduction in government investment for building new homes, until a public housebuilding programme was effectively non-existent (Parkinson, 1989; Gallent, Durrant & Stirling, 2018).

Simultaneously, the ability of local authorities to pursue social justice objectives became even more limited, and in many cases the explicit labelling of strategies and policies as “anti-racist” i.e. having a deliberate focus on ensuring equal outcomes, was watered down into the broader “equal opportunities” agenda, which also considered other issues such as gender or disability (Griffiths & Amooquaye, 1989; Thomas, 1994). This was explicitly seen as a problem by some Black planners who feared that “allowing [these] different forms of oppression to be considered together...risked neglecting the distinctive features of each” (Griffiths & Amooquaye, 1989, p.7)

During this overall scale-back of power, any focus that authorities like the Greater London Council may have had on pursuing more explicitly anti-racist initiatives and strategies was “made to appear ridiculous, subversive, politically embarrassing or unlawful” (Griffiths & Amooquaye, 1989, p.5). Ouseley (1990) wrote that by the end of the 1980s, the press had somewhat succeeded in characterising the anti-racist agenda as ‘loony leftism’ and a waste of public funds. Thomas (1994) therefore argued that in this political climate, there was no incentive for local authority planners to view their role as having social objectives, and the minority of progressive authorities became more reluctant to pursue policies that could be considered controversial (Solomos, 1993).

Tackling racial inequality via planning

Having considered how planning has generally tended to be conservative in its approach to social objectives, and the limitations imposed on those local authorities that attempted to pursue more progressive social aims, this chapter will now discuss past attempts by the planning profession to address racial inequality in particular. Since the 1970s, various efforts have been made to investigate how racial inequality may manifest itself within the planning system, not least through the commissioning of national level reports into these issues in the 1980s and 1990s. The findings of these respective reports were relatively pessimistic, yet the literature suggests that their recommendations for improvement have never been effectively implemented. As such, there is continuing evidence that the planning system does not adequately address or seek to tackle issues of racial inequality in its current policy and practice.

1970s-1990s

Anti-discriminatory legislation concerning the treatment of resident minority populations has been enshrined in UK law since the introduction of the 1976 Race Relations Act. The Act makes the distinction between ‘direct’ and ‘indirect’ forms of discrimination, and outlaws both; the latter is argued to be “extremely important for bureaucratic procedures, of which there are many in planning, where formal equality of treatment is a criterion of adequacy or even success” (Thomas & Krishnarayan, 1994, pp.1896-1897). Furthermore, under this legislation every local authority was given a statutory duty to “make appropriate arrangements with a view to securing that their various functions are carried out with due regard to the need (a) to eliminate unlawful racial discrimination; and (b) to promote equality of opportunity, and good relations, between persons of different racial groups” (1976 Race Relations Act, Section 71).

In the late 1970s and early 1980s there was a small minority of vocal leftist activists within planning who wanted the profession to adopt a more radical agenda in pursuit of equal opportunities (Thomas and Krishnarayan, 1994; Thomas, 2008). One result of this pressure was the publication of the milestone 1983 *Planning for a Multi-Racial Britain* report by the Royal Town Planning Institute (RTPI) in collaboration with the Commission for Racial Equality (CRE)¹. The report particularly criticised planning’s ‘colour-blind’ approach and demonstrated that planners were wrong to assume that equality of outcomes could be guaranteed simply by subjecting all those submitting planning applications to the same

¹ The CRE was a governmental body established under the 1976 Race Relations Act (Farnsworth, 1989; Thomas, 1994a, 2000), which has since been replaced in its duties by the Equalities and Human Rights Commission (EHRC).

bureaucratic and procedural processes (RTPI/CRE, 1983). Griffiths & Amooquaye (1989) maintained that following the report's publication, "it ceased to be possible for town planners to argue that they had nowhere to look for ideas about why and how to build an awareness of race issues into their practice" (p.5). Nevertheless, it proved difficult to keep this momentum going through the 1980s (ibid; Farnsworth, 1989), due in part to the limitations to local authority influence already discussed earlier in this chapter.

In 1993 the RTPI revisited the issue of racial equality with the publication of a second report, *Ethnic Minorities and the Planning System* (Krishnarayan and Thomas, 1993). The report detailed some positive case studies – for example, Leicester City Council had commissioned research projects focused exclusively on ethnic minority communities, and the London Borough of Waltham Forest recognised the importance of monitoring the ethnicity of planning applicants to ensure equal outcomes. Both authorities also made more sophisticated attempts to identify the housing needs of ethnic minorities and to meet these through the planning system. However, aside from a small minority of more progressive authorities, it was concluded that very little progress had been made in a decade. The researchers determined that there was "a continuing uncertainty, even ignorance, among planners of how direct and institutional discrimination may manifest itself in planning and of the significance of fundamental procedural devices such as monitoring" (Krishnarayan and Thomas, 1993, p.32) and that the "first, and overwhelming, impression [was] of the invisibility of black and ethnic minorities [in policy and plans]" (ibid, p.54). The report recommended that planning authorities should be "made fully aware of the implications of Race Relations legislation for their planning functions and of the relevance of racial and cultural diversity for plan-making implementation" (ibid, p.86) and that "central government...produce advice, as a circular or planning policy guidance, which focuses on race and planning" (ibid, p.87). A later report published by the Local Government Association was equally pessimistic, suggesting take-up of the recommendations of the 1983 report had been very limited (Loftman and Beazley, 1998).

New Labour Era

The New Labour era brought some renewed hope that more attention would be given to issues of racial equality, particularly following the introduction of the Race Relations (Amendment) Act 2000 (Harris & Thomas, 2004; Phillips, 2005). The original 1976 legislation was revised following an enquiry into the death of Black British teenager Stephen Lawrence and the subsequent mishandling of the investigation by the Metropolitan Police. The 1999 Macpherson Report used the term institutional racism, and concluded that discrimination was not, as had previously been accepted, simply practised and experienced by individual persons, but was instead a sign of collective organisational failure (Macpherson 1999; Thomas, 2004; Storry, 2018). The new Act (2000) therefore urged public institutions to be proactive rather than reactive in their response to discrimination; they were to assume that their practices were discriminatory (in varying degrees) and were expected to try and combat this by implementing changes in the wider organisational culture.

The Labour government showed some commitment to providing more national guidance on how this related to planning, with the Office of the Deputy Prime Minister (ODPM) commissioning a study into how diversity planning could be 'mainstreamed' into overarching national planning guidance (Booth et al., 2004). The report acknowledged that planning policy can affect the distribution of resources to particular groups of people and stressed the importance of considering who may gain and lose from particular planning strategies. However, the researchers found that national Planning Policy Guidelines (PPGs) contained a lack of explicit references to diversity issues, and that there remained a lack of knowledge amongst public sector planners of how to relate diversity to spatial planning (ibid, p.ii). With findings similar to that of the 1993 RTPI report, it appeared that in 2004 the planning system was still struggling to understand the implications of race legislation for its practices, with Harris & Thomas arguing at the time that "the continuing limitations of contemporary British planning threaten to disengage land use planning from the Labour government's drive to ensure that public services are delivered in a way which is sensitive to social diversity" (2004, p.478).

The continuation of property-led approaches to regeneration during the 2000s was also a cause for concern with regards to outcomes for ethnic minorities in inner-city areas (Thomas, 2008). Colomb (2007) argues that "a plethora of academic studies and evaluation reports demonstrated the shortcomings of property-led regeneration as practised in the 1980s, in

particular the limitation of the so-called ‘trickle-down effect’ and the negative social costs of flagship projects such as the London Docklands” (p.2). In 2007, the CRE published *Regeneration and the Race Equality Duty*, one of its final publications before it was subsumed into the Equality and Human Rights Commission (EHRC). The findings of this report have been described as “disturbingly reminiscent of discussions in planning more than two decades before” (Gale & Thomas, 2018, p.462).

However, the New Labour Government’s more concerted efforts to promote diversity and equal opportunities did extend to considering the needs of Gypsy and Traveller communities when tackling social exclusion (Gale & Thomas, 2020). The Housing Act of 2004 required local authorities in England to undertake Gypsy and Traveller Accommodation Assessments (GTAAAs) and to then incorporate the findings into their overall housing and homelessness strategies. Circular 01/06 issued by the ODPM set out broad policy aims to increase the number of authorised Gypsy and Traveller sites and to promote their way of life (Brown & Niner, 2009). Though there was still much work to be done – a report by the CRE (2006) concluded that Gypsies & Irish Travellers were the most excluded groups in Britain at the time – this demonstrated a more concerted effort to mainstream the issues faced by Gypsy & Traveller communities into policy considerations, and some positive, though patchy, progress was achieved (Brown & Niner, 2009).

Furthermore, during this period there was also greater focus on the ‘business case’ for pursuing such aims (Hutchings & Thomas, 2005); a 2004 report for the private sector argued that failure to recruit from and appeal to BAME communities would be to ignore both a source of talent and a growing market (Task Force on Race Equality and Diversity in the Private Sector, 2004). The report also maintained that focussing on racial equality initiatives would enable private sector companies to build public trust and community relations and to therefore enhance their corporate reputation (ibid). Simultaneously, there was a shift away from an outright focus on institutional racism to broader issues of equality and diversity (Phillips, 2005; Gulliver, 2016; Gale & Thomas, 2020). However, it is argued that whilst this shift towards diversity “might have reduced anxieties of planners about race equality, [it came] at the cost of relegating racial justice from being a matter of principle commanding special attention to being one among a multitude of factors to weigh in the balance of day-to-day planning priorities” (Gale & Thomas, 2020, p.139). Overall, then, despite seeming commitment from the Labour government to ‘mainstreaming’ diversity, the same persisting barriers continued to restrict the impact of this agenda in the planning profession, and “[b]y the end of Labour’s time in office, the momentum on race equality in planning was already slowing” (Gale & Thomas, 2020, p.139).

2010 onwards

At the start of the new decade, the Race Relations (Amendment) Act 2000 was superseded by the Equality Act 2010 which outlawed discrimination on the basis of nine protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation (s.4). The Equality Act also includes a public sector equality duty (PSED), which requires public bodies to “have due regard” for how their policies and practices impact upon people in these nine protected groups, with an aim to “eliminate discrimination”, “advance equality of opportunity” and “foster good relations” (s.149). It has therefore become common practice for public sector bodies to complete equality impact Assessments (EqIAs) when introducing any new public policy, in order to assess the potential impacts of this kind – the completion of an EqIA is not in itself legally necessary, however the use of these assessments is recognised as a way for organisations to sufficiently demonstrate compliance with the current statutory requirements of the PSED.

Local authorities that fail to demonstrate a consideration of the potential impacts of their decisions on persons with protected characteristics can therefore be subject to legal challenge on this basis, and this consequently also applies to planning decisions. In particular, compulsory purchase orders (CPO) issued by local authorities can sometimes be challenged through public inquiries, as was the case for the Aylesbury Estate regeneration scheme in the London Borough of Southwark. Following the inquiry, the Secretary of State decided to refuse to confirm the CPO, with one of the grounds for this decision being the application of the PSED and a concern that there would be significant negative impacts on groups protected under the Equality Act 2010 (Thomas, 2017).

More recent discussions surrounding how issues of racial equality intersect with planning have included a focus on faith and explored how religious groups, in particular Muslim organisations, have come into contact with the planning system through the establishment of new places of worship in towns and cities (Gale 2008; 2009; Gale & Thomas, 2015; 2020; Greed, 2015). Gale & Thomas (2018) have argued that this research has “revealed a pattern of disadvantage that suggests...a further manifestation of the inability of planning to operate constructively in a racialised context” (p.462).

The relatively small amount of positive progress towards considering the needs of Gypsy and Traveller communities in England made under New Labour governments has been broadly undone by successive Conservative-led governments since 2010 (Ryder, 2015; Gale & Thomas, 2020). The coalition government did not seek to monitor local authorities' individual assessments of Gypsy & Traveller needs, nor to intervene where these were clearly poor; they also showed varying commitment to EU policies on Roma integration (Ryder, 2015). In 2013, Local Government Secretary Eric Pickles revoked Equality and Diversity in Planning guidance and granted greater powers to local authorities to enable them to “clamp down quickly on illegal encampments”, contending that “the public want to see fair play, with planning rules enforced consistently, rather than special treatment being given to certain groups” (MHCLG, 2013, para.6). In 2015, Pickles was ruled to have unlawfully discriminated against a racial group by systematically ‘calling in’ planning appeals from Romany Gypsy communities on Green Belt land for his own decision (Press Association, 2015). Legal definitions were also altered so that “[p]ermanent cessation of travelling, for any reason, means that people are no longer defined as Gypsies and Travellers for the purposes of planning policies” (Gale & Thomas, 2020, p.96). This has therefore shifted the legal definition further away from ethnicity and personal identity and has also greatly impacted how GTAAs calculate the requirement for Traveller pitches, meaning that councils may risk vastly understating the accommodation needs of Gypsy and Traveller groups (Ibid).

Following extensive research on the subject, Gale and Thomas conclude rather depressingly that ever since the CRE report in 1983 “discussion of the ‘race agenda’ in UK planning has been limited and sporadic, mostly taking the form of awareness-raising through reiteration of the RTP/CRE recommendations” (2018, p.461). In their most recent book, they further assert that “[a]nyone reviewing key aspects of race and planning in Britain in the last 50 years or so will be struck by two things. The first is planning’s somewhat surprising arm’s length relationship to race equality [and] the second...is the waxing and waning of race equality as a concern of government and the profession” (Gale & Thomas, 2020, p.136). It could therefore be argued both that planning needs to accept more responsibility for dealing with issues of race equality, but also that this needs to be firmly on the agenda of central government in order to achieve real progress.

In light of the resurgence of debates around racial inequalities in the UK following the death of George Floyd in the US and subsequent Black Lives Matter protests around the world, new discussions around race, ethnicity and urban planning have come to the fore. Beebeejaun and Modarres (2020) state that “sustained institutionalized racism continues to negatively affect the daily lives and life chances of Black and racialized ethnic people in the urban realm” (p.6). Wilder (2020) argues that over the past year in particular, “the dual crises of a pandemic and mass social unrest revealed the ugly realities of persistent patterns of discrimination, violations of civil rights, and unequal access to opportunities experienced by marginalized racial and ethnic groups” (p.1). Alongside their 2020-2030 Corporate Strategy, the RTP/CRE has committed to a new 10-year “Change” action plan that aims to ensure that more efforts are made to increase equality, diversity and inclusion within recruitment to the profession (RTP/CRE, 2020b). The Bartlett School of Planning has also introduced a new “Race and Space” curriculum for its students (Bartlett Annual Review, 2020). There is therefore some evidence that events of the past year have motivated institutions concerned with the education and coordination of planners to more thoroughly consider how race and ethnicity intersect with their practice.

Local planning strategies

The planning system can at least in theory alleviate racial inequalities in housing and meet BAME housing needs by influencing the type, size, location and quality of local housing stock. However, this review of previous research on planning’s role in this area historically has shown that planning has to date struggled to pursue socially progressive

agendas and to relate issues of racial equality to its practices. Against this background, this chapter will now discuss the current National Planning Policy Framework (NPPF) and its implications for how local planning authorities develop planning and housing strategies that aim to meet the needs of local residents.

The National Planning Policy Framework

The latest National Planning Policy Framework (NPPF) was published in 2019 by the Ministry of Housing, Communities and Local Government (MHCLG). The framework sets out the UK Government's planning strategy for England as a whole and provides guidance on how this should be implemented. It is also complemented by a collection of Planning Practice Guidance (PPG). The NPPF includes a statutory requirement for all local planning authorities to produce a local development plan detailing their own planning strategies and guidance; in doing so, local planning authorities must take account of the strategic priorities established in the NPPF. The Greater London Authority (GLA) is the only body that currently produces a Spatial Development Strategy (the London Plan) that applies at a regional level; this strategy is also statutory and means that all London boroughs must take account of both the NPPF priorities and the London Plan regional planning priorities when designing their local development plans.

Identifying local housing need

The NPPF places various requirements on local authorities with regards to how they develop their respective housing strategies, though the most relevant in this case is that it includes "a presumption in favour of sustainable development", which in turns means that "strategic policies should, as a minimum, provide for objectively assessed needs for housing" (NPPF, 2019, para.10).

Consequently, it is stated that "to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment" (para.60) and that "the size, type and tenure of housing need for different groups in the community should be assessed and reflected in planning policies. This is identified as including, but not limited to:

- those who require affordable housing,
- families with children,
- older people,
- students,
- people with disabilities,
- service families,
- travellers,
- people who rent their homes, and
- people wishing to commission or build their own homes" (para.61).

Though the NPPF states that the groups listed are not exhaustive, it does not at present explicitly include faith or ethnic groups in its examples (with the exception of travellers whose unique needs are considered within GTAs). Some local authorities will give consideration to the needs of faith or ethnic groups when fulfilling their statutory requirement to conduct a strategic housing market assessment (SHMA), though this is based on their own discretion – such an inclusion is therefore partially reliant on the ability or willingness of local authority strategists to consider these issues as relevant. SHMAs are then in turn used to identify suitable land for new housing and develop associated planning strategies and aims in a Local Development Plan and/or a Housing and Homelessness Strategy; if the needs of BAME groups are missing in the SHMA, it is therefore more likely that they will also be missing in policy and strategy.

There is however an additional requirement for local authorities to consider the amount of new affordable housing needed in the local area and “where a need for affordable housing is identified, planning policies should specify the type of affordable housing required” (para. 62). Owing to the specific issues of housing affordability faced by BAME communities as detailed in chapter one, it may be that some of the particular needs of these groups are implicitly assessed under this requirement – however this is not clearly stated.

The same general requirements for completing an SHMA exist for London boroughs, however the situation is unique in that “the responsibility for the overall distribution of housing need in London lies with the Mayor as opposed to individual boroughs so there is no policy assumption that this level of need will be met within the individual boroughs” (MHCLG, 2015, para.34). The latest SHMA for the London region, conducted in 2017, considers the following in its chapter entitled “Housing requirements of particular groups”:

- private-renting households;
- self-build and custom housing;
- family housing;
- housing for older people;
- households who require accessible or adapted homes;
- student housing;
- armed forces;
- Gypsies and Travellers

(Greater London Authority, 2017).

Excepting the separate inclusion of Gypsies and Travellers, there is no explicit consideration given to the needs of faith groups or ethnic minorities. Of particular importance for this report, the information and data provided as evidence for the groups that do see an inclusion is not disaggregated by ethnicity or faith. The decision whether to consider the needs of resident BAME populations is therefore at present left up to individual local planning authorities as it is not a requirement in the NPPF (or GLA policy for London).

The 2017 SHMA carried out as evidence for the London Plan is an example of an assessment that does not include information on the housing needs of faith groups or ethnic minorities, and subsequently the London Plan also does not include associated policies for these groups. This may suggest that if local planning authorities are to consider BAME housing needs when developing planning policy and housing strategies, this would require going beyond what is explicitly included in statutory requirements. We have also seen evidence over a run of decades, that in this context and perhaps unsurprisingly, planning has consistently struggled to pursue racial equality or indeed any broader social objectives within policy or practice.

Planning and development

Having considered the mechanisms currently available to local authorities for identifying the housing needs of BAME communities, this chapter will now consider the context in which local authorities would be seeking to meet these needs.

Planning as a profession seeks to deliver more holistic urban design than market development would provide on its own, as developers in a capitalist economy would seek to build the largest number of housing units on any available plot of land, and for the lowest costs, in order to maximise profits – this leads to what is known as “default urbanism” (Adams & Tiesdell, 2013). Whilst local planning departments can push back against this by drawing up local policies and strategies that encourage more sustainable development, the influence that a local planning authority can have over the location,

design and particularly the affordability of these developments remains inherently tied to the local real estate market. In areas where interest from developers is high, planners may have more negotiating power to secure so-called ‘planning gains’ from developers, e.g. by stipulating the percentage of affordable housing required from a new residential development, or requiring the delivery of at least some housing of a certain type or aimed at a certain group. However, in areas where interest from developers is low, planning authorities may not be in a position to negotiate with developers if this would jeopardise the overall delivery of new dwellings. Additionally, it has been argued that the system of financial viability assessments in place since 2012 has “allowed big developers to shirk their affordable housing obligations if they can show that building low-cost homes on a scheme will threaten their ability to make a 20% profit” (Grayston, 2018, para.1). Securing planning gains therefore relies somewhat on the negotiating powers of planning staff, as well as their ability to enforce obligations without compromising the overall financial viability of a development; such powers fundamentally vary between persons and areas (Dunning, Ferrari & Watkins, 2016).

Some have argued that the discretionary powers granted to planners to manage land use can fundamentally constrain the delivery of new housing and that this is detrimental to solving housing problems in the UK (Airey and Doughty, 2020; Breach, 2020); Shelter (2020a) have conversely argued that this is an oversimplification of the problem, pointing to evidence that 40% of all homes granted planning permission in England between 2011 and 2019 went unbuilt. Moreover, an independent government review found that developers of large sites with planning permission will purposefully deliver housing in phases so as not to saturate the market and drive down prices (Letwin, 2018). The push from developers to maximise their profits in this way is often linked to the high price they may have paid for the land on which to develop – residential land values in the UK rose by 583% between 1995 and 2017 (Grayston, 2019). Access to land has therefore become one of the key barriers for local authorities and housing associations seeking to deliver more affordable or social housing (ibid). It has thus been argued that in many areas, it may not be the planning system itself that is a barrier to housing development and consequently that simply granting more permissions may be a less effective solution than e.g. comprehensive land reform (Grayston, 2019; RTPI, 2020a; Shelter, 2020b).

Furthermore, the Government has recently announced that, from August 2021, an increasing number of residential conversions will not be subject to planning permission at all. These ‘permitted development rights’ will be extended to allow a change of use from ‘Class E’ commercial, business and service uses to residential use without prior permission. The RTPI has expressed “grave concern” about these upcoming changes, citing a potential loss of commercial diversity on local high streets and the possibility that this will lead to an increase in poor quality homes (RTPI, 2021). Evidence from an independent government review found that homes developed under the current permitted development system are of a lower quality standard than residential schemes that go through planning permission, with only 22.1% of permitted development dwellings meeting the nationally described space standards (Clifford et al., 2020). This may prove to be of particular significance for BAME communities, as they are more likely than white residents to live in urban centres and in poor quality accommodation, as discussed in chapter one.

In a political environment of austerity in which “every aspect of public service, including planning, need[s] to demonstrate its usefulness in addressing what [are] deemed politically to be the most pressing problems” (Gale & Thomas, 2020, p.140), it has been argued that planning policy agendas such as social housing reform and racial equality initiatives have simply been subsumed into the broader pressures for housing delivery and concerns of economic development and regeneration (ibid). The TCPA (2020) therefore contend that “clarity around the purpose of planning would help restore confidence that decisions were in the wider public interest and not dominated by needs of developers. It would give all parties confidence that the system was about making healthier more sustainable places and not just about housing numbers” (p.2).

Conclusion

Racial inequalities persist in the UK across almost all aspects of public life, as outlined in chapter one. It may therefore be somewhat unsurprising that the UK planning system too has struggled to ensure that its policies and practices have fair outcomes that meet the needs of all racial groups. But what is altogether more alarming is its continued failure to contend

with this issue since the RTPI first took stock of the situation in the early 1980s. The legal obligations for public authorities to have due regard for racial equality considerations apply to planning policy and practice in so far as they apply to all public policy agendas; however the planning system has always tended towards socially conservative outcomes, and those local authorities that have attempted to pursue a more progressive agenda in the past have struggled in the face of a lack of commitment from central government and, more recently, continued budget cuts during an era of austerity.

At present, the NPPF does require planning authorities to objectively assess the housing needs of local community groups – however, neither faith groups nor ethnic minorities are included in the examples of those that should be considered. As an assessment of local housing need will be used as a basis for developing local planning policies and housing strategies, a lack of inclusion of the needs of BAME groups in the assessment may lead to a lack of consideration in policy. Local authorities that do consider the needs of faith groups or ethnic minorities are therefore taking a more proactive approach to meeting BAME housing needs than is required of them by national policy; it remains unclear how common this may be among local planning authorities, but historical evidence suggests that planning does not tend to be proactive in its approach to issues of racial equality.

If planning authorities were to accurately identify the needs of BAME groups, their ability to deliver suitable housing to fulfil these needs would remain somewhat tied to local housing market trends – a current overarching focus from central government on increasing housing delivery may therefore come at the expense of broader social objectives such as the pursuit of racial equality in housing.

4. National-level findings

Introduction and structure

This chapter presents the findings drawn from interviews with eight key stakeholders working across the areas of planning, housing and inequalities in England. An overall assessment will first be given on the role that the current planning system plays in addressing racial inequality and meeting the housing needs of BAME groups. The common challenges that may hinder local authorities' efforts to address these issues will then be discussed, before variation in local authority practice, as well as the drivers behind this variation, are then considered. Finally, the value of holistic reforms in this regard across sectors beyond the planning system is considered, before the potential for specific planning reforms is discussed.

The role of the current planning system

There was a general consensus that whilst the idea of an inclusive planning system has been long discussed, this has never really been achieved in practice. It was argued that there is little evidence of racial equality being a key concern of planning authorities, nor is the planning system seeking to make this a fundamental aim of its activities.

Going back to the '60s there's been an understanding that planning has got to be inclusive... If you asked [local authorities if they see racial equality as relevant to planning policy and practice] they would all say yes of course we do. But if you asked them, "well what have you done about it?", I think they'd struggle to identify what they've actually done, and I think that's where we are now – (National Key Informant, Planner)

Some participants suggested that where planning does impact on racial equality, it is often unintentional or a by-product of other decisions, and that such indirect outcomes can often be negative for ethnic minorities. Furthermore, most participants made some mention of how local planning authorities may be reproducing or even exacerbating inequalities, rather than addressing them, and felt that not enough is done to question these effects. Some participants also expressed concerns as they recalled experiences of more overtly discriminatory views held by professionals working within local authorities or the planning system.

I've heard people talk about Traveller communities in ways that are just absolutely horrifying. I'd like to think that people don't talk about my community in that way, but I suspect that they probably do. That has really surprised me when I've heard that sort of language being used. Senior people on the political spectrum but also on the administrative side – (National Key Informant, Planner)

Examples were given of features within the planning or wider housing system that participants felt may sometimes be used to attempt to address racial inequalities and meet the housing needs of BAME groups. The most-mentioned were housing needs assessments (or SHMAs), equality impact assessments (EqIAs) and opportunities for public consultation and engagement in the planning process. However, the general consensus was that on the whole these were not being used successfully to address racial inequalities, nor really with this aim in mind.

The effective use of EqIAs was particularly questioned. Some participants maintained that EqIAs are often not conducted at all in the public sector. It was also argued that when they are completed and

where potential discrimination against protected groups is identified, there is no requirement for local authorities to act on these findings.

[I]n my borough, it's very much a tick box... [I]t's something that I brought up when I was first a councillor and they were explaining that they have to do these assessments because they can't discriminate unless they've considered it. So I was like...you can discriminate as long as you do it consciously? – (National Key Informant, Local Councillor)

Participants often referred to the competing objectives that exist within the planning system and discussed how it is frequently necessary for planners to prioritise some at the expense of others. In an environment in which reducing racial inequality in housing and meeting the housing needs of BAME groups are not explicit aims of the planning system, there is arguably a low chance of local planning authorities giving weight to these goals at the expense of, or even alongside, other objectives.

Therefore, the consensus amongst participants was that the planning system at present does not actively address racial inequalities through its practice, and whilst there may be some features of the planning system that could be used to progress this aim, these are not specifically formulated for this purpose, nor used effectively to pursue it. These findings are thus in alignment with the available literature (see Chapter 3) and it can be contended that little has changed in this regard.

Why is racial equality still not a planning priority?

Participants felt that there are some challenges that are common across most local authorities which could be preventing the aims of reducing racial inequality in housing and meeting the housing needs of BAME groups from being prioritised within planning policy and practice. The following five key themes emerged:

i. Lack of capacity and funding

A major challenge highlighted by participants was the continued lack of funding and capacity within local authorities, which may force them to choose to pursue certain aims over others.

I don't think local authorities particularly use their powers [to address these issues] They're so stretched, resource wise. What will tend to happen, for example, with housing is they'll just be glad they get some... If it addresses a particular niche or doesn't... it doesn't necessarily figure – (National Key Informant, Housing Association)

It was thus argued that whilst local government finances remain limited, planners and other local authority staff have little time or energy to devote to issues that are not legal obligations.

I think generally the headspace or the institutional capacity to address equality issues that aren't mandated by law is quite weak at the moment – (National Key Informant, Health Analyst)

As discussed in chapter three, there is currently no statutory requirement to assess the housing needs of ethnic or faith groups, or to carry out EqlAs (though the public sector equality duty must be adhered to).

ii. Absence of central government directives

A number of participants therefore made the point that there is currently no obligation or guidance from central government that requires or encourages local authorities to address racial equality in housing and meet the housing needs of BAME groups. The combination of this lack of central guidance and the aforementioned capacity and funding issues was felt by participants to constrain the ability of local authorities to actively pursue these aims through planning.

Through a period of restructuring and time, we kind of moved away from it being a central function...to something that...we were saying was everybody's responsibility... You might have heard this phrase, the thing about a dog that's owned by the village often goes hungry. You make something everybody's responsibility and actually what you've done is you've made it nobody's responsibility, and that's where I feel we are at the minute – (National Key Informant, Planner)

iii. The downsides of participation

Public participation in planning processes was a key theme to arise in interviews. Participants' responses seemed to align with the argument expressed in the literature that public consultation in planning generally reinforces existing power dynamics and consequently does not work to reduce racial inequalities.

How you access [the planning system] as a member of the public...it works, and you can follow it and you can interact with it if you have a lot of time [and] if you are fairly either well educated or confident enough in your own knowledge to know where to access it – (National Key Informant, Community Organizer)

[T]he people who are able to apply that pressure and influence on decision-making are actually a fairly narrow element of society... [W]hen you start looking at the groups that we're talking about, BAME populations, women, people with disabilities, lesbian and gay, when you build that up...this is the majority... So actually we've got a system that works for a very self-selecting minority and I think that's the thing that we've never really managed to tackle – (National Key Informant, Planner)

It was therefore felt that the mere existence of democratic processes does not alone ensure that all ethnic groups (or all marginalised groups in general) are equally heard, and can in fact be counterproductive to these aims. One participant recounted an experience in which pre-existing biases amongst local authority staff meant that engagement alone did not preclude discriminatory practices.

[T]he first bullet point in the code of conduct that [the council] sent over [to the residents' partnership board] - and they were sending this to a chairwoman who's a black single mum - was that the residents' group, basically, which means her, shouldn't come to the meeting drunk or on drugs – (National Key Informant, Community Organizer)

Whilst there was a general consensus that opportunities for democratic participation within planning are not accessed equally, participants' views about why this happens differed. It was argued that well-designed participation processes can facilitate involvement from a range of community groups, and that BAME communities do engage in consultations.

There's been that assumption that because you don't get [much] NIMBYism occurring in the areas where minority communities are focused, that minority communities aren't interested in planning. Well, my experience has been exactly the opposite... [I]f you talk to people in those communities, they're very interested in planning because they experienced it in ways that a lot of the NIMBY communities don't...and yet somehow [NIMBY] communities are the ones who are driving the agenda – (National Key Informant, Planner)

However, the argument was also put forward that structural issues such as tenure length remain a barrier to greater involvement from BAME groups.

I think...people from ethnic minority backgrounds are disproportionately renters. That transience [of rental households] means rationally you have less incentive to engage with things such as planning consultations. Speaking anecdotally, if ever I was renting, I would immediately bin any kind of planning consultation document that came in, just like, "...there's no guarantee I'll be here in two months..." – (National Key Informant, Health Analyst)

Questions were also raised about whether consultation responses generally ever go on to be meaningfully reflected in policy-making and decision-making processes.

From first-hand experience of us doing work with community groups, we've seen how community consultation is anything but, often – (National Key Informant, Socioeconomic Researcher)

iv. Insufficient diversity within the profession

Some participants also expressed concerns about the lack of diversity amongst planning and housing professionals. It was argued that this can have a negative effect on non-white communities because planners may not always think about how their actions may impact on BAME groups if they have no personal experience of the issues these groups face.

[In] government or local authorities or the public sector or the private sector, [the power] is in the hands mainly of white, middle or upper-class people... I think that the lack of empathy with those who are in poverty who will tend to be from minority ethnic backgrounds...will mean that it doesn't cross your mind that you could work differently... or that your policies impact on those communities – (National Key Informant, Housing Association)

However, participants also highlighted that simply increasing diversity within these professions is not a guarantee that all voices will be given equal weight; the view was expressed that where planning teams are more diverse, ethnic minorities are rarely found in senior leadership positions.

[As] you start looking...at where BAME planners are located, you find they're very much at the front delivery end... [so] there is very little representation at the more senior levels of planning authorities – (National Key Informant, Planner)

Overall, the planning system was seen to be one system of many in which this problem persists, as the current balance of power within planning reflects broader societal trends and inequalities. Staff are also operating in an environment which, it was argued by some participants, refuses to acknowledge the existence of institutional racism.

The first [key constraint]...is individual and political-institutional racism. [By that] I mean...the people [and institutions] that have control over planning policy and [its] implementation... That is the limitation on the ability of the planning system and planning policy to start addressing racial inequality – (National Key Informant, Housing Campaigner)

Though the planning system is influenced by these broader historical and societal forces, it was argued that attempts should still be made to address issues of diversity within the profession if there is any hope that it will be able to make sustained, positive progress towards reducing racial inequality and meeting the housing needs of BAME groups.

v. Data gaps

Participants suggested that there are some data or information that planners and policymakers simply do not have when taking decisions or implementing policy that could impact on ethnic minority populations; this may therefore mean that such decisions or policy could have impacts that were unexpected and potentially negative for these groups.

As with lots of other evidence around race in general, and [particularly] race in housing...the quality of [housing need evidence] is limited. The detail and instructiveness of it also limited to demographic statistics and information, which is only one part of the housing experience of marginalised...and racialised groups – (National Key Informant, Housing Campaigner)

One participant gave an example of a request they made to a council to provide data on the race of residents in a particular tower block, but this information was not available. Some participants suggested that information which was once collected as part of wider public sector equality duties, and which could have assisted local authorities in reducing potentially negative outcomes of policy-making on ethnic minority groups, is often no longer recorded by local authorities.

[When I worked in various councils] we used to collect data on applications and applicants [but] that questionnaire bit no longer exists. So I'd question the extent to which we have the data now that actually tells us who's involved in the processes in our area and what they think – (National Key Informant, Planner)

From [the 1980s onwards] there was a significant amount [of] regulation about...the EqIAs, there was publicising your targets, demographics in terms of census information, housing needs indicators were very much about ethnicity. Then it went into the doldrums for years and years...then you get the pandemic, and Black Lives Matter [and] it's back on the agenda – (National Key Informant, Housing Association)

The question was therefore raised as to whether a local authority can claim to have a focus on reducing racial inequalities and meeting the housing needs of BAME groups whilst data gaps such as these exist, as outcomes for minority groups cannot be properly monitored.

Drivers of local variation

As discussed so far in this chapter, the overall consensus was that both the national planning system and local planning authorities generally do not have a major focus on reducing racial inequality and meeting the housing needs of BAME groups. There were however some differences between local authorities which participants felt could to some extent affect whether these issues are prioritised

within local planning policy and practice. Three central issues emerged that were seen to drive variation between local authorities in this regard:

i. Pressure for action

All participants felt that local authorities have a lack of awareness of the extent of the issues facing ethnic minority groups, but some also perceived that there can be an unwillingness to deepen understanding which can therefore prevent the needs of these groups from being considered.

I don't get a sense [that LAs see racial equality as relevant to planning policy]. Until the pandemic, it was very hard to get any discussion about EDI [equality, diversity and inclusion] on the agenda to be perfectly honest...[T]hat is partly what I do all the time, and it's very, very difficult to raise these issues or get them into any sort of environment – (National Key Informant, Housing Association)

I think that...it's willful ignorance where it's not seeing the linkages between poverty and racism...and housing, and work, and every other social problem that there is. Obviously, there are lots of smart people in local authorities who do know these things – (National Key Informant, Socioeconomic Researcher)

It was also argued that the existence of strong leadership within a local authority impacts on whether there is a willingness to tackle issues of racial inequality.

I think it helps if other leadership within the council, whether that's corporate or political leadership, are keen to take this on as an agenda and then that can feed in at that higher level and create some space for these agendas to be meaningful – (National Key Informant, Academic)

Therefore, whilst there was agreement that there is little explicit focus on these issues in planning generally, it was felt that any local planning authorities that could pursue a more proactive agenda in this regard would likely be subject to corporate or political pressure to consider these types of aims.

ii. Local demographics

In a similar vein, it was felt that any more proactive racial equality agendas amongst local authorities may be related to the size of the BAME community in a local area.

What I've observed over the last 20-odd years is very much part of it is about the percentage of the population. [X Northern English town] I'd say, relatively low percentage of BME people in its constituency, so whilst it's got an interest in EDI...the reality is it's not a priority because the percentage is so low – (National Key Informant, Housing Association)

It was argued that greater consideration may be given to racial equality issues in areas with larger BAME communities as planners and councillors are more likely to reflect the populations that they serve. It was further suggested that this trend can result in difference between practice in urban and rural areas, as larger BAME communities still tend to be found in urban localities.

I would say London local authorities are still going to be leading in this because they will have a wider range of councillors and planners in their authorities just because of demographics there – (National Key Informant, Academic)

It was therefore argued that the local authority areas in which racial inequalities related to housing may affect a greater number of residents tend to have more conversations about how to tackle this problem; whether the existence of these conversations results in any proactive policy or practice in this regard remains uncertain based on the conclusion that planning does not generally focus on these issues.

iii. Housing market context

Participants highlighted that different geographies result in varying housing market contexts and trends between local authority areas. It was argued that the influence that local planning departments can have over the quality and affordability of new housing developments, and therefore potentially on housing outcomes for ethnic minority groups, may be less in areas where there is not a strong market for new developments and therefore planners need to 'take what they can get'.

Not only can the planning system not solve problems and market failings in those areas where development doesn't exist, but also therefore when you see changes within the planning system...they carry less significance for those places where development isn't happening or likely to happen – (National Key Informant, Housing Campaigner)

Consequently, as issues of housing quality and affordability often affect minority ethnic groups in particular, the planning system in these areas may potentially have less ability to influence housing outcomes for these groups.

The untapped potential of the planning system

Most participants felt that the planning system is a significant element of the wider political and economic system within which it operates and could therefore be a good area to try and advance and improve practices in order to make a tangible contribution to the end goal of achieving racial equality in housing.

I suppose the question [might be] where can you add value? If there is untapped potential in the area of planning, which there may well be to address racial inequalities...then that's a great thing to focus on – (National Key Informant, Health Analyst)

Participants also generally felt positively about the ability of the planning system to successfully implement these sorts of reforms, should it choose to in future.

I don't think people realise just how much of our local communities the planning system has an impact on... I'm every week finding myself surprised by exactly how much it covers. So I think if it was improved it would be a massive step forward in getting there, particularly if it was improved in a way that gave people of colour more of a voice in it – (National Key Informant, Community Organizer)

As discussed earlier in this chapter, there are various drivers that exist that may cause regional variation between local authority areas. However, overall it must be noted that there seems to be no great focus on this agenda in planning, and therefore it was argued that all local authorities could be brought along on a potential journey of improvement, regardless of their individual focus on these issues to date.

There are different demographics, there are different challenges and different economic situations, obviously, but none of that replaces the need for equality. Yes, people in Hull might be poorer than people in London, but black people in Hull are even poorer than white people in Hull. So you still...tackle inequality regardless of geography – (National Key Informant, Local Councillor)

i. National planning reform

Firstly, some participants expressed the view that a thoroughgoing reform of the planning system would be needed to enable the pursuit of racial inequality and to better meet the housing needs of BAME groups.

[T]he purpose, and the aims, and the priorities of the planning system would be my number one target for fixing it to address housing inequalities – (National Key Informant, Housing Campaigner)

There was a general consensus that the particular power that developers seem to exert over the planning system should be reduced, and that residential developments should be viewed as more than simply an economic commodity that developers can profit from.

[B]ecause race and the impact on particular minority communities isn't really considered... you can build 5000 properties [but] if they're all million-pound penthouses, [that will exclude the existing population but minority communities in particular] because of where we are economically. [My experience is that planning] just nurtures the idea that properties are for-profit and that what matters is the value of something, rather than the value of that as a home for someone – (National Key Informant, Local Councillor)

Some participants expressed apprehension about the contents of the 2020 planning White Paper, *Planning for the Future*, arguing that there is no meaningful mention of equality and diversity considerations beyond a short paragraph. It was therefore felt that these issues cannot be considered to be on the agenda, or even within the remit of planning, if they are not currently included in plans for national planning reform.

The White Paper doesn't specify [considerations for equalities and particular groups] and that is telling. It's not telling on a conspiratorial level - if it's not there, they don't care - it's important because it reveals the priorities, like what we are trying to achieve through the planning system – (National Key Informant, Housing Campaigner)

In order to improve planning's focus on such issues, most participants therefore wanted to see an increased emphasis on reducing racial inequality and meeting the housing needs of BAME groups within central government planning policy and guidance.

If we had a [National Planning Policy Framework] which had some statements about planning's purpose and increasing racial justice being part of that,...that would put a clear message that [this] was something...relevant for planners to be thinking about and talking about – (National Key Informant, Academic)

If equality was more embedded within the planning laws, then when you think about regenerating an estate, for instance... it's not just, we need to build loads of council flats because there's a need... You also think this is an existing community with

networks and links and history... Is what we're building here going to completely change that community...? – (National Key Informant, Local Councillor)

Some participants also took this a step further, suggesting that simply producing policy and guidance for local authorities on how to address these issues through the planning system would not be sufficient unless this is coupled with a legal obligation to act. In particular, it was perceived that EqlAs are often ineffective at present because their findings can simply be shelved; it was therefore reasoned that there should be a statutory requirement for local planning authorities to take account of the outcomes of both EqlAs and public consultation responses in decision-making processes.

I think [using EqlAs] has to be coupled with like an obligation to act when the equality impact assessment actually shows something would have an adverse impact on a particular group – (National Key Informant, Community Organizer)

[There should be] requirements within the planning system to demonstrate that your consultation has sought and achieved the participation of a range of groups ... Then, that consultation being effective [and] being required to have an impact on [policies being developed] – (National Key Informant, Housing Campaigner)

This was therefore connected to the idea that educating the public around any legal duties that councils have surrounding issues of racial equality would consequently force planning departments to try harder to reduce racial inequality and meet the housing needs of BAME groups.

[W]hat you would do is, you open up to councils the risk that their decisions are going to get challenged legally. If [councils] know: "actually, we've not adhered to the equality stuff on this and people are being educated about how they could enforce us to do that; then we're at risk of being legally challenged, or having massive delays to the things we're doing". – (National Key Informant, Local Councillor)

It was however concurrently argued that if these aims did become national planning priorities, appropriate funding would need to be provided to local authorities to enable them to effectively pursue these aims.

ii. Data collection

It was argued that in order for planning departments to reduce racial inequality and meet the housing needs of BAME groups through their policy and practice, a key reform would be for local authorities to gather more comprehensive data on which ethnic groups are affected by planning decisions. Existing studies on racial inequality in planning have argued for the importance of both gathering data on applicants and monitoring outcomes of applications (RTPI/CRE, 1983; Krishnarayan & Thomas, 1993). It was however also suggested by participants that more qualitative metrics could be used to measure the outcomes on different groups.

I think the planning system can be the starting place...for developing that understanding [of housing outcomes for racialized groups]... Within planning there are the foundations of really good tools for doing that in housing need assessments and the general skills and knowledge of the planning discipline in...shaping cities and places to meet particular outcomes based on particular priorities and principles – (National Key Informant, Housing Campaigner)

iii. Improved public consultation?

Owing to concerns around the tendency for affluent, established households to dominate in consultation responses, participants were divided on whether more public engagement on planning decisions would further racial equality and better meet the housing needs of BAME groups.

It could be a useful tool, but it might actually potentially backfire, I think, if it's reflecting established households – (National Key Informant, Health Analyst)

Some participants therefore made the distinction between 'more' and 'better' consultation, with better consultation being designed in a way that promotes outreach amongst ethnic minority communities.

I think more consultation versus better and more prescriptive and meaningful consultation. [T]here are quite considerable duties for consultation...within the local planning system; more of that wouldn't necessarily improve the participation or engagement with it... – (National Key Informant, Housing Campaigner)

I think a planning system has to be genuinely co-produced in order to produce the vision that we want to see, but also have that outreach that is necessary so that everyone's voice is heard within it, and not just the people who...go on council websites all the time – (National Key Informant, Community Organizer)

Interesting observations were made about how new online methods of consultation used during the COVID-19 pandemic have succeeded in including a more diverse range of voices, and it was argued that these improvements need to be sustained in a post-pandemic planning system.

[W]e're now using things like webcasts to promote a development, we're having proper engagement events [online]... we're operating outside of normal hours... People [from all sorts of backgrounds] are starting to engage with the process, [who] have actually commented that ordinarily they wouldn't be able to... We need to somehow capture that experience and build it into the things that we do going forward. It would be a real shame if we just went back to what we were doing previously, knowing how limited that has been – (National Key Informant, Planner)

However, as discussed in chapter 3, structural inequalities that exist in society and which continue to affect who has the knowledge, time, and resources to engage in public consultation mean that simply improving consultation processes may not be enough to address the wider forces that prevent ethnic minorities from participating (Beebeejaun: 2004; 2006; 2012).

Beyond the planning system

Participants identified various policy areas that could be targeted alongside the planning system in order to pursue a more holistic approach to effectively tackling racial inequality in housing and meeting the housing needs of BAME groups.

The housing sector

A key policy area mentioned was the housing sector itself, and one theme that emerged was that cross-working between planning and housing teams could be streamlined to ensure that both are working to achieve the same overall aims. Firstly, it was suggested that both sectors could work together to pursue a greater focus on 'who' exactly planning and housing policy is for.

[I]t's almost that [planners are] more interested in maintaining what [already exists]... or making sure you don't do anything that spoils the view, rather than who is it going to be used for... If there was an imperative that said, 'How will this property be used and who will be living in it? Is there a need to make sure that it works in a certain way?', then I think you would get a much better tie-in... between housing development and what planners do – (National Key Informant, Housing Association)

Secondly, arguments were made for a greater focus on the quality of homes rather than just on increased supply. It was suggested that the planning system could play a role in improving quality, particularly as there were concerns that residential conversions completed under permitted development rights may have particular issues with regards to quality.

[We are interested in] the quality of homes which... tends to fall by the wayside because the focus is on addressing these supply constraints. We see [that] specifically in relation to permitted developments whereby the focus is on converting things that are inappropriate to be homes into homes at the cost of liveability... [T]hat, to us, is a health risk... – (National Key Informant, Health Analyst)

[I]t would be quite interesting to see things such as the office to residential permitted development; who actually ends up living in the poorer quality of those? Is that skewed towards BME populations? You find that out [and] hopefully you could stamp that policy down quite quickly if you've got this as an overriding goal of the planning system – (National Key Informant, Academic)

However, it was also suggested that improving the quality of homes would require robust enforcement of environmental health laws, therefore this issue would again require a holistic approach from planning, housing and other sectors.

I think what's good is that [X London borough] actually try and enforce these laws... Enforcement of housing violations is incredibly patchwork across England. It's, I think, largely discretionary, so it's why we get this huge disparity between [X London borough] accounting for 60 per cent or whatever it is of these prosecutions in the country... So is that enforcement of the planning system? I don't know, it's probably more like environmental health laws – (National Key Informant, Health Analyst)

Thirdly, the design of new housing developments and subsequent approval of these through the planning process was also highlighted as an area in which more thought could be given to BAME housing needs; it was argued that the presence of particular interior design features often prevent certain ethnic groups from being able to live in new properties.

[O]ne of the last new developments we did...it had to be open plan. The problem with that is if you come from a Muslim background, obviously you have to have a place to pray, and also women and men shouldn't mix at certain times. You can't live in an open plan house... So even though we took the scheme... we couldn't house anybody in it [who was a Muslim]... I think there are some things...that planning should have a voice on, in terms of who it potentially, inadvertently, is discriminating against. – (National Key Informant, Housing Association)

Other policy reforms

Continuing in the theme of a holistic approach to tackling racial inequalities in housing and meeting BAME housing needs, participants felt that to pursue these aims effectively, collective reforms are needed across several policy areas outside of planning and housing, most notably labour market or economic policy, and welfare policy.

[To be able to] shift things more in favour of race equality, it needs a whole-system response, frankly. It's about the housing sector, it's about [the] planning sector, it's about land, it's about transport, it's about air quality... [Planning is] able to influence elements of that but not the whole piece – (National Key Informant, Planner)

Participants highlighted historic and existing inequalities between ethnic groups in the UK, particularly with regards to income and asset accumulation, which they argued have in turn led to inequalities in accessing suitable or desired housing options. Some participants therefore argued that economic reforms outside of the planning system would be necessary to reduce racial inequality in housing and meet the housing needs of BAME groups, in order to ensure that minority groups can afford the housing they would like and also have sufficient income to enjoy it.

The [measure] where there's biggest inequality by ethnicity is overcrowding, [which] is, to a large extent, a problem of affordability... The reforms to [Local Housing Allowance] have made it over time less and less generous and the shortfall between rent and the amount of support you can get through Housing Benefit greater and greater, so I think that would be a key one [to reform] – (National Key Informant, Health Analyst)

[T]he racial pay gap is a pay gap that we never talk about...[W]e never talk about how much worse that gender pay gap is for black women, or how wide the racial pay gap is across the board. A lot of the issues around housing in particular that we've got are that...when your wages are low you have to, basically, rent what you can afford – (National Key Informant, Community Organizer)

Furthermore, some participants felt that the way the economy currently shapes local housing markets and development considerations constrains the planning system's ability to achieve racial equality and meet the needs of BAME households, and that therefore this would need to change to pursue these aims through planning.

I think it would be an unrealistic expectation to say the planning system could [achieve racial equality] on its own. In the end we're talking about land and the distribution [and ownership] of land has all sorts of inequalities built into it... Yes, the planning system has an ability to even out some of that lumpiness but, fundamentally, we're talking about resources that we don't necessarily completely control – (National Key Informant, Planner)

[One] of the big issues that we see with housing at the moment is that... the general dictates that we live under...is that markets are neutral and will synthesise what they produce to human need. [That] isn't the case, because actually what will happen is you will get like a piece of land in an area that desperately needs affordable housing...bought by a private developer who then land banks or builds luxury flats that don't get filled – (National Key Informant, Community Organizer)

All participants agreed that more investment in social housing would go some way to achieving greater racial equality and meeting BAME housing needs. That said, there were caveats attached to this, surrounding how transformative this solution can be on its own, how it should be funded and allocated, and how to prevent it from being perceived as 'second-rate' in comparison to private rentals or home ownership.

[T]he provision of non-market housing is really important... I say 'non-market' because I don't just want to say state provision, but the starting point will be state provision of affordable and non-market housing – (National Key Informant, Housing Campaigner)

There's certainly, I would say...a big shift to saying that social housing is good, in the sense that people are likely to be living in decent quality accommodation, they're more safe and secure... But [social housing] mustn't be seen as some sort of second-rate housing or last resort – (National Key Informant, Housing Association)

The continuing existence of racism and discrimination in UK institutions was also seen as a constraint on the planning system's ability to reduce racial inequality and meet the needs of BME households, and therefore it was argued that wider conversations about these issues are needed across all policy areas in order for this link to be seen within the housing and planning sectors.

You would expect to see variation [in how local authorities address these issues], but I think there are authorities where actually, it's not just variation, it's almost denial of the communities you see on a pretty routine basis – (National Key Informant, Planner)

[W]ithout the conversations of racism and capitalist injustice being linked in our mainstream discourse, of course, local authorities aren't going to think about racism and housing... – (National Key Informant, Socioeconomic Researcher)

In summary, there were a number of wider policy reforms across the housing sector, the labour market, the development economy, and the welfare system that participants suggested would be needed in future alongside planning reforms in order to further the aims of achieving racial equality in housing outcomes and better meeting the housing needs of BAME groups.

Conclusion

The planning system is clearly not the only policy area in which reforms need to be sought in order to reduce racial inequality in housing and meet the needs of BAME households – it is therefore unlikely that planning reforms alone would lead to these aims being achieved by local authorities in England. However, participants were in agreement that the scope and influence of the planning system means that local planning authorities could play a much more significant role in reducing racial inequality in housing and meeting the needs of BME households. In order for this to occur, most felt that the core aims of the planning system would need to change to reflect these new goals, and would require guidance or directives from central government, as well as appropriate resourcing, for local authorities to pursue this agenda.

In the absence of more overarching planning reform, it was felt that there are some common tools within the current planning system that could be improved in order to reduce racial inequality in housing. One such tool was identified as public consultation and engagement opportunities; however it was argued that these can be useful in this regard only if they go beyond the appearance of

democracy and ensure meaningful involvement of marginalised groups. A second tool of this kind was equality impact assessments (EqIAs), which could be reformed to have mandatory requirements attached, obligating local authorities to act on any inequalities they reveal.

In order for both consultation opportunities and EqIAs to be more effectively utilised, better data and systems of measurement are needed to record the impacts of planning decisions on different ethnic groups. The planning system is seen to be a policy area in which professionals have the tools and skills to collect such data, and it was argued that research to fill existing data gaps would occur relatively quickly if there was a central obligation to pursue a racial equality agenda.

The planning system is therefore a policy sphere in which significant value could be added to a wider conversation around reducing racial inequality in housing and meeting BAME housing needs, and moreover it was suggested that the recent resurgence of debates around these issues could be channeled into the production of a racial equality agenda across all public policy areas, and that a joined-up approach between planning and other sectors would be a substantial step towards achieving racial equality in practice.

5. Case Study Results

This chapter will analyse the results of qualitative research interviews carried out with stakeholders in four local authority areas: the metropolitan district of Bradford, and the London boroughs of Harrow, Lambeth and Lewisham. A summary of the most prevalent housing needs for BAME groups in each local authority is first provided, before the main housing and planning strategies pursued in each area are outlined. This is followed by a discussion of the factors which may affect a local authority focus on BAME housing needs, and subsequently the extent to which the domains of planning and housing can improve housing outcomes for BAME groups is considered. Finally, the future role of planning in addressing these issues is discussed in the context of the wider political, social and economic landscape in which planning operates.

Housing needs of BAME groups

Three key themes emerged in relation to the housing needs of BAME groups in the four case study areas:

i. Lack of affordability

In all three London case study areas in particular, it was highlighted that BAME groups may often be the most affected by the current high prices in the capital's property market and struggle to access even housing that is presented as an 'affordable' option.

[I]f you are part of the BAME community and probably economically more disadvantaged, affordable housing isn't affordable anyway... [C]ertainly in Harrow...where there are a lot of working people but on low incomes, they're never going to be able to access affordable housing – (Local Stakeholder, Law, Harrow)

[N]ew development is now completely unobtainable for your average person in [Lewisham]. Our income levels here mean that the only housing option for many of our residents is social rented or London affordable rents, even other affordable products aren't accessible to them... There is a disproportionate amount of our BAME communities who sit within there – (Local Stakeholder, Planning, Lewisham)*

Therefore, in the London case study areas there was a recognised need for more affordable rental properties in order to meet the housing needs of BAME groups. In Bradford, however, the affordability problem was identified as being slightly different, as private rental properties in the area can be a more affordable option than even social housing where private landlords are aiming to attract tenants. BAME households therefore often choose to rent privately due to the lower overall costs; however, this kind of rented accommodation can be of very poor quality.

"There is an affordability issue here because, sometimes the private sector's cheaper than social housing. Property values in Bradford are really, really low and the rents in Bradford for social housing are lower than the average. What landlords will do is charge quite low rents just to get people in. So, some people would choose to live in that unfit housing because it's affordable – (Local Stakeholder, Housing, Bradford)

It was therefore identified that affordability issues may particularly affect BAME households in all case study areas; however, it was also acknowledged in both Bradford and London that ethnic minorities are not a homogenous group, and that some BAME communities and individual households will be more affluent and thus less affected by affordability issues.

ii. Lack of larger properties

In Bradford, all participants referred to the need for larger family housing with three or more bedrooms, and this was considered by most to be the main housing need of BAME groups in the district. Lewisham was also felt to have a similar issue.

I don't think there's enough properties...in the Bradford district, to cater for the BAME community in terms of stock size... You can't get properties that are four, five, six bedrooms which a lot of obviously South Asian households definitely do need within the Bradford district (Local Stakeholder, Housing, Bradford)

We know that we generally need larger housing units [for] multigenerational families, which again is not how the white population tend to live now... [W]e've got a large Vietnamese community in Deptford and [studies showed] they needed five, six-bedroom houses (Local Stakeholder, Planning, Lewisham)

Participants in Harrow also identified a need for family-sized housing in the borough, though this was in response to a question about general housing need locally and so, in contrast to in Bradford and Lewisham, was not explicitly stated as being required by BAME groups; however, with 69.1% of Harrow's population being non-white, this could be inferred.

We had a SHMA [strategic housing market assessment] for West London done... and that's what we picked up on really, was a need for family housing in the borough.... As I say, the largest need is for two and three beds, if you're looking at it anecdotally. So that's our greatest need for family-size rental. That's where the pressures are on our housing register – (Local Stakeholder, Housing, Harrow)

It was also acknowledged that this need for larger family housing is linked to the unaffordability of larger properties in the private rented sector (PRS), and therefore simply delivering more larger housing would not alleviate the high market prices associated with these properties.

There's a lot [of larger properties] in obviously the private sector and on the market but if you look at the composition of people within Bradford, they can't always go down that road – (Local Stakeholder, Housing, Bradford)

I think [delivering larger housing for multigenerational households] quite often comes down to affordability in terms of whether or not that actual housing requirement is actually affordable to the family itself – (Local Stakeholder, Planning, Harrow)

Delivering larger or 'family-size' housing however remains a strategic aim of the housing strategies in Bradford and Harrow, even though participants recognised that there would remain an issue of affordability should this policy be successful.

iii. Poor quality homes

In all the case study areas, it was recognised that BAME communities often end up living in poorer quality homes. In Bradford, this was related to large BAME communities living in older, back-to-back terraced housing in the inner-city which may be in a state of disrepair or may also be overcrowded. These problems were in turn linked to the aforementioned issues of affordability and stock size, and it was argued that BAME communities often live in this in poor-quality housing due to a lack of other affordable options that suit their needs.

We noticed that the Asian heritage community were not living in social housing and yet what they were living in was unfit housing. Part of the issue was it was the wrong type of housing that was on offer in social housing, which was then the council, because it was high-rise housing in those areas in the main – (Local Stakeholder, Housing, Bradford)

In Lambeth, existing council estates are home to high numbers of BAME residents, and it was argued by the local authority that these estates are no longer fit for purpose due to their small size, state of disrepair, and energy inefficiency.

[D]emolishing the estates, I see it as a way of... giving residents better quality homes, and better heating, a better public realm, better lighting... there is a huge benefit in terms of how BAME communities can feel mentally positive about an area that is quite nice-looking, as opposed to quite dark and quite fearful – (Local Stakeholder, Housing, Lambeth)

There was an acknowledgment that regeneration is also a way to deliver more affordable housing, though the effectiveness of this approach was called into question by this participant:

The argument that the politicians will give you... is that in a time of extreme cuts... this model of estate regeneration...it's the only way they can build affordable housing in the borough.... I would say...it doesn't work. Actually, it completely changes the composition of local communities... especially Black and Minority Ethnic communities who get displaced from those places – (Local Stakeholder, Independent, Lambeth)

Therefore, there was disagreement on the best way to meet housing needs of BAME communities in Lambeth and whether poor quality housing, which was argued to impact negatively on the health and wellbeing of resident BAME communities, should be subject to regeneration if this leads to the displacement of such communities. One participant acknowledged that regeneration is not always immediately welcomed by communities, but argued that it was still in their long-term interest.

[V]ery often, an estate has been designated for regeneration for very good reasons... all the reasons that those people on the estate have been complaining about... However, when you then say that you're going to basically tear down somebody's home, it's quite emotional...There's so much uncertainty and disruption for an individual ... it can take a while for somebody to get their head around what that means and to see the end goal – (Local Stakeholder, Housing, Lambeth)

Local strategies

Having compared the housing needs of BAME groups identified across the case study areas, this section will explore the profile of BAME housing issues in local strategic housing market assessments (SHMAs) and participant perspectives on the role of SHMAs in informing policy.

Reference was made to local SHMAs by at least one participant in all four local authority areas. Bradford and Lambeth have their own individual SHMA, whilst Harrow and Lewisham are included in the SHMAs for West London and South East London respectively. The SHMA for Lambeth makes reference to the BAME population but this is solely in terms of population demographics and future projections. The other three SHMAs do include specific chapters on the housing needs of Black and

Minority Ethnic populations in the local authority areas, with information included variously relating to tenure, typical household size, location, religious and cultural requirements of housing, and the socioeconomic background to these statistics.

However, the availability of detailed evidence on the housing needs of resident BAME populations was questioned by participants in the study across all local authority areas, and this theme was particularly apparent in interviews in Harrow.

[We don't have housing needs data] specifically in terms of BAME groups as such. [Our SHMA] doesn't, from memory, go specifically into a huge amount of detail in terms of the various different ethnic groups and their housing needs... We'd pick up elements in terms of, say, numbers of...multigenerational households, but does it specifically drill down...in terms of various different ethnic groups? I don't think it does – (Local Stakeholder, Planning, Harrow)

Planning policy

Even considering the inclusion of some information relating to BAME housing needs in their respective SHMAs, the planners interviewed in Bradford, Harrow and Lewisham all felt that addressing racial inequalities in housing or meeting the housing needs of BAME groups were not explicit aims of planning policy in their respective local authorities. External stakeholders in Bradford and Harrow also felt that these were not clear aims of local authority core planning strategies.

At the moment [meeting BAME housing needs is] not a specific, explicit aim of the local planning review as such... [T]he current local plan predates me when it was adopted, but I don't think it was an explicit aim there – (Local Stakeholder, Planning, Harrow)

Despite not thinking that this was a particularly explicit aim of planning policy, it was acknowledged that in Bradford the needs of BAME groups are referred to in the core planning strategy under the 'housing mix' chapter. It was also pointed out that the SHMA does form an integral part of supplementary planning guidance – whilst it is less 'front-facing', it was argued to be the appropriate place to consider the needs of particular groups in depth.

[The SHMA is] not saying, oh, BAME housing, we need to do something. It's okay, what's the evidence around the nature of this stock? Who lives where? Are there issues of overcrowding? Condition of that stock?... So some of that...indirectly then feeds into the policy approach... If you look at the adopted Core Strategy on the housing mix policy, BAME is explicitly mentioned... So it's in there – (Local Stakeholder, Planning, Bradford)

[The SHMA] reflects on BAME communities as a...specific community group [and] goes into a little bit more detail about different...wards or constituencies, whereas the core strategy documents and the local plan [are] on a much wider platform. So I think the SHMA's probably the best place to have some of that more specific information. Again, it is a supplementary planning document which has to be taken into consideration as part of that planning process – (Local Stakeholder, Housing, Bradford)

In Lewisham it was argued that addressing BAME housing needs is not explicit in the core planning strategy, but that this an implicit focus of the emphasis the strategy places on affordable housing policies, given the particular profile of residents affected by affordability issues.

I would say [addressing BAME housing needs] is the highest priority but in the terms of affordable housing, and I think because of... the BAME households who are in temporary accommodation on the waiting list, when we talk about affordable housing, that's generally who we're talking about it for, but it's not expressed in that way... – (Local Stakeholder, Planning, Lewisham)

This therefore raises the question of whether explicit policy inclusion is necessary if there is an awareness of the underlying issues; however, the same participant acknowledged that this awareness is not the same amongst all planning staff and therefore that more explicit policies could help:

I think we could probably make it a bit more explicit. [An] overview of who is on the list and who is near the top of the list, not identifying them, but the type of characteristics, so that we can say, 'This as a scheme will have a positive impact on that,' may be worthwhile. I think members get it, I'm not sure all planning officers get it. I think the more senior you are, the more you have that insight, I think that just comes with experience – (Local Stakeholder, Planning, Lewisham)

Housing policy

Participants working in housing were more likely to initially say that addressing racial inequalities and meeting housing needs of BAME groups were explicit aims of respective local authority housing strategies, which may reflect the fact that whilst the SHMA is a statutory planning document, it is often housing teams that engage more closely with it. However, when asked to elaborate, a participant in Bradford stated that these aims may be more inherent within a “Homes for All” agenda rather than explicit.

It's 'homes for all', so I suppose it's that inclusivity, and making sure that the homes that we're delivering meet the needs of our residents now and in the future... [I]t's looking at reducing homelessness and working with that client group...[So] in terms of 'homes for all' [meeting BAME housing needs] would fall into that category I think – (Local Stakeholder, Housing, Bradford)

A participant in Harrow similarly concluded that these aims are implicit within affordable housing strategies in the borough owing to results of EqIAs and SHMA evidence, rather than stated as explicit aims within policy.

There is an EqIA attached to the housing strategy and it's clear within that... there is overrepresentation amongst certain black and multi-ethnic groups compared to the white population [in homelessness presentations etc.]. So, if we don't have enough supply of affordable housing, that directly correlates to that really, as well as other lower incomes, lower prospects, poverty, etc., etc. So, I think that's quite an explicit aim of our housing strategy... – (Local Stakeholder, Housing, Harrow)

However, another participant working in affordable housing in the borough was less sure how issues relating to the housing of BAME groups was relevant to their practice, explaining:

“[I]t's just not my area. BAME matters don't touch my job role at all in that way, well, in any way” (Local Stakeholder, Housing, Harrow)

Therefore, there was some disconnect between staff in Harrow as to whether meeting the needs of BAME groups could be considered part of the borough’s affordable housing strategy.

One participant in Lambeth felt that separating out BAME housing needs from general housing needs in the area may not reveal anything new in a borough where the overall need is for good quality, safe and affordable rental homes.

[P]art of me thinks ...the housing needs of BAME groups is not going to be any different to anyone else... most people want good quality, safe, affordable rent homes in an area where there's low levels of [antisocial behaviour] and they feel safe... Most people want the same things – (Local Stakeholder, Housing, Lambeth)

In Harrow, funding from central government for community-led housing projects was allocated to a Muslim community group following consultation; the funding was not aimed at ethnic or faith groups specifically, however the community-led focus of the project allowed a faith group to access the funding.

I have two community-led housing projects on the go... One in terms of its end users are people with mental health difficulties and the other one is a Muslim group linked to a mosque... [B]ecause it's a community-led housing project... community groups such as a BAME groups or people with mental health issues or any other issues can self-select to develop affordable housing for themselves – (Local Stakeholder, Housing, Harrow)

Overall, it can be seen that the aims of reducing racial inequality in housing and meeting BAME housing needs may be more implicit in both planning and housing strategies, but that there were participants that had an awareness of these issues and their relevance to certain policy areas. However, some participants were less certain how these aims related to their work. A positive example of a community-led housing project in Harrow was also not explicitly aimed at BAME groups, although it did enable a Muslim faith group to access funding and support for housing.

What factors may affect a potential focus on BAME housing needs?

The case study data suggests that there are four key factors in particular that may increase an area's potential focus on BAME housing needs. These are: local leadership and partnership working; available evidence; public attitudes; and awareness, skills and diversity.

i. Local leadership and partnerships

In all local authority areas, it was said that local political leadership and agendas can impact on decision and policymaking within the planning and housing domains. It was argued that local politicians putting weight behind certain agendas can be enabling for planning staff, though none of the examples given explicitly related to BAME housing needs.

[I]n our current political cycle with the mayor that we have and with the cabinet member that we have, we've achieved a lot more because they have been so clear about what they want, and therefore in the priorities, the other things compromise – (Local Stakeholder, Planning, Lewisham)

In Bradford, partnership working between the council and local housing associations with a knowledge of BAME housing needs in the district was seen to be a tool for ensuring that these needs are considered, and this was viewed as positive by stakeholders involved. BAME-focussed organisations such as housing specialists and religious leaders were stated as being included in decision-making processes at a high level.

[B]radford council is a great partner [and] I can't speak highly enough of the collaboration... [T]here is a lot of joint working and to address the needs of the BAME communities. [T]hey are approachable [and] I would say the council [are] really good listeners. [When] we [do] developments, because of that collaboration, we do discuss what we want to develop and why – (Local Stakeholder, Housing, Bradford)

It was acknowledged by an external housing stakeholder that the council had included a reference to BAME housing needs in their local housing strategy after a consultation process. The current housing strategy for the district references the need for “homes for a diverse population with differing need including homes for larger families and those which meet cultural needs...” (Bradford Metropolitan District Council, 2020, p.6).

We were consulted on the housing strategy...and it was really interesting to see that they had nothing around BME within the original draft strategy... But we managed to get something in there about meeting BME housing need, because we know that the majority of BME community live in poor-quality, private-rented accommodation. Until that's acknowledged and addressed, I just don't think you could have probably a robust planning system that addresses that BME housing need, really! – (Local Stakeholder, Housing, Bradford)

Furthermore, representatives of both Bradford housing associations included in this study were able to give examples of how they have been able to build or design properties that specifically meet the identified needs of BAME groups in the area, and the council in turn gave examples of how they have altered the design of their own developments based on consultation with these other housing providers and community groups.

One of the feedbacks that we have had and reflected in our [regeneration] programme was specifically from BAME households around the design... [S]ome of the houses...were quite open plan downstairs... Which wasn't an attractive layout to certainly Asian families... That resulted in us adapting and changing that particular layout, particularly in locations where we were likely to have large numbers of BAME families who might be seeking to move into that accommodation – (Local Stakeholder, Housing, Bradford)

The leadership displayed from external organisations has therefore had positive outcomes in terms of housing delivery to meet these specific needs. However, it could also be argued that the council themselves have displayed some leadership on these issues by inviting external involvement in decision-making processes, as this has led to alterations being made to both the housing strategy and the design of regeneration programmes. Despite the criticisms of consultation identified in the literature and picked up in interviews with key informants, in this instance the result of consultation increased the range of views represented in planning and housing policy.

[W]here the Council owns its own land it can very much stipulate what it wants to see on that land. So whether we're building it ourselves...or selling the land or working in partnership as part of a joint venture to have it delivered, we can through that process very much dictate the standards and the quality and the design of that. I think that's again where we can show that leadership – (Local Stakeholder, Housing, Bradford)

Therefore, it was felt that strong leadership and effective partnership working on these issues, whether that came from politicians or from housing providers within or outside of the council, could be used to push for a greater focus on meeting the housing needs of local BAME communities.

ii. Available evidence

A lack of evidence on BAME housing needs in Harrow was repeatedly cited as a reason why more explicit policy may not be pursued in this regard. There was a view amongst local authority participants that very robust evidence would be needed to prioritise the housing needs of a specific societal group; it was felt that in the main, the aim of planning was to give equal weight to the needs of all residents.

We still have to go back to the evidence base, because you're talking to...a very ethnically diverse borough, and potentially for example...if it was necessary and it met the tests...[using Section 106] we could say a certain percentage of people allocated to the housing list for example were from a BAME background. Then we would need to be able to evidence the reason behind that and give it solid foundations – (Local Stakeholder, Planning, Harrow)

[W]e go where the evidence takes us. So if the evidence in relation to housing suggests a certain response that may...pick up some of the issues in terms of black and ethnic minority groups, then that's where the evidence takes us... [T]he local plan is for all of society, and therefore...if it was an explicit aim, are we then being seen to be not giving that same sort of weight in relation to other groups in society as such? I think that would probably potentially be a risk, – (Local Stakeholder, Planning, Harrow)

In Bradford, there was an awareness that the evidence available allowed a focus on BAME housing needs to an extent, however there was still felt to be a limit on how far this could be pursued based on the current aims and function of the planning system.

I think doing what we do at the moment, if we have the right local evidence, it probably goes as far as you can, because I don't think it's the right thing to probably say, 'This house has to be for a certain ethnic group.' I think it's got to be a more broad offer. So I think it's making sure we get the right offer in that new facility for the type of quality of build, the mix, the design – (Local Stakeholder, Planning, Bradford)

Therefore, planners in all areas felt that they would need strong evidence in order to justify prioritising the needs of certain groups above others, as in the main their role is understood to involve meeting the needs of all of the residents in their respective local authority area.

iii. Public attitudes

Participants also pointed out that there is already a significant level of pushback from some local residents if it is felt that new development is aimed at a certain group of people that is not them; it was also felt that these public objections can have discriminatory undertones.

[I'm] not convinced that some communities in our borough would see delivering BAME housing as a positive thing for their areas. I think that will be couched in concerns about design [and] impact, but...I would say there's an undertone of... it's expressed in very polite, white middle-class terms, but there's a level of alarm that isn't perhaps there in other places, in my view – (Local Stakeholder, Planning, Lewisham)

There's always a dynamic in some of those communities who say, 'This house is not for us, it's for somebody else.' So there is a cohesion issue that starts to creep out in some of the conversations linked to planning. Some of that's about I suppose the...perceived poor, and then there's the BAME, even though it's not as explicit I don't think, but there is an element of that that creeps into some of the dynamic conversations – (Local Stakeholder, Planning, Bradford)

Therefore, this problem was linked back to the need to have robust evidence for any policies specifically prioritising the housing needs of BAME groups, as it was felt that there is already an issue with NIMBY-ism when it is perceived that particular developments may end up housing BAME or low-income residents, even when this is not explicitly stated.

Conversely, public campaigns aiming to advocate for the housing rights of BAME residents on council estates resulted in at least one case where a local authority's regeneration plans and CPO were subject to a public inquiry which ultimately found in favour of the existing residents.

When [X London borough] was demolishing [X council housing estate] there was a public inquiry into that brought by the leaseholders, so the residents who owned their own properties. The public inquiry actually found in the leaseholders favour and said...that the compulsory purchase order breached the Equality Act 2010 as the majority of those affected were from Black or Minority Ethnic backgrounds (Local Stakeholder, Independent, Lambeth)

It is thus possible for planning authorities to be subject to legal challenges if it can be proven that proposals have an adverse impact on any groups with protected characteristics under the Equality Act 2010. Therefore, EqlAs and the public sector equality duty can be used as a basis to prevent negative outcomes for BAME groups, though the push to ensure this may come from outside of the local authority in the form of public or legal pressure for change.

iv. Awareness, skills and diversity

In both Lewisham and Harrow, planners felt that there was perhaps not always an awareness amongst the profession as to how issues relating to racial equality and the housing needs of BAME groups could be relevant to their work.

I don't think [there is a general awareness of these issues amongst planners], but to be honest with you, until your approach, it's not something that I had given much thought to in respect to...what I do on a day-to-day basis... I have an awareness around the subject matter, but it's not something that I personally have linked to my job, if that makes sense? – (Local Stakeholder, Planning, Harrow)

In Bradford it was argued that there was a strong awareness of these issues amongst housing providers in the area, and that whilst the council may not always get things exactly right, there was a general willingness to partner with such providers who have this awareness.

Absolutely [there is an awareness of these issues in Bradford]. [T]here is a specialist [BME housing association] ... because we realised we were not doing very well. We were not [able] to attract anybody from the Asian community.... About four years ago, there was [a merger between another BME housing provider and a local housing association]. What it meant was we got a greater understanding of the needs of the BAME communities...I'd say there's an awful lot of joint work that goes

on. I think Bradford's pretty good really, it's not perfect, it's always listening and learning, I would say – (Local Stakeholder, Housing, Bradford)

In Harrow, it was felt the ways in which these issues are handled can depend on the relevant skills and expertise of planning and housing staff. One participant gave an example of how they had been able to help implement a housing project in the borough as they had previous experience working on a similar project. An external stakeholder felt that the relative affluence of some parts of the borough may also mean that the work of some planners may never intersect with the issues facing more deprived communities.

I think when that funding [for community-led housing] dropped into the various boroughs' banks, there wasn't an awful lot of understanding of how these things work. It was just lucky that I came from another organisation where we had worked with local groups to develop housing, so I was able to help this project – (Local Stakeholder, Housing, Harrow)

Harrow is generally seen to be a leafy suburban area with pockets of, as they will say it, problem areas. They don't therefore have the right skillset. If you're used to dealing with applications for...I don't know, your outhouses and all this kind of thing, where is your expertise going to be? What are you going to draw on to say actually, this is what this section of our community needs? Whereas I think if you go further into London where they're having to deal with these kinds of issues more routinely, they've got an expertise...and they can perhaps apply it better in their planning process – (Local Stakeholder, Law, Harrow)

This lack of awareness in Harrow was perceived by participants despite census data showing that 69.1% of the borough is non-white (ONS, 2018). This therefore somewhat contradicts the findings of key informant interviews which suggested that a larger BAME population in a local authority area would result in a greater awareness of the issues facing these groups.

In Lambeth, it was acknowledged that there was a need to increase diversity amongst staff, with the view to increasing awareness of how to work with communities facing particular housing issues and broadening the range of voices included in high-level decision-making.

[One] of the things that we have looked at in Lambeth is to ensure that...we have a diverse range of officers who are able to work with our communities. So for example, in terms of recruiting more BAME officers at a senior level...more female, or more from the LGBTQ community. So within Lambeth Council there is a push to ensure that our staff are reflective of our community, and that way they can better understand and have an influence I guess at a London-wide strategic input – (Local Stakeholder, Housing, Lambeth)

Therefore, issues of awareness, skills and diversity were all felt to affect the focus that local planning departments may have on reducing racial inequality in housing and meeting BAME housing needs.

How much influence can planning have on improving BAME housing outcomes?

Five key themes emerged relating to how far planning policy and practice may be able to improve BAME housing outcomes. It was felt that planning could have most influence over housing needs evidence and the design of housing, at least some influence over the location and quality of housing,

but little influence over the viability of developments and the genuine affordability of housing for residents.

i. Gathering evidence

Within the current planning system, it was acknowledged that EqlAs, public consultation processes and SHMAs could all be used to build an evidence base relating to the housing needs of BAME groups, which could then potentially form the justification for the introduction of specific housing or planning policies to address this need. Section 106 agreements were also cited as a potential mechanism with which housing could specifically be delivered for BAME groups if this evidence was gathered.

However, these were described by one participant as ‘soft tools’, and whether and how they are used in pursuit of this agenda is currently at the discretion of local authorities. Therefore, they would perhaps only be used for this purpose if councils were specifically prioritising meeting the housing needs of BAME groups. Furthermore, the general effectiveness of such tools was called into question across the local authority areas, particularly with regard to public consultation and the perceived difficulties in engaging residents from all backgrounds in order to represent the views of all residents in planning and housing processes.

Yes, definitely [certain groups get more involved in the planning process than others] and that is a fault of the system and that's something which we need to resolve because...broadly speaking you're talking about...that older white, middle class or above... they're probably the ones who [own] their own home...they've got security of tenure. [T]hey may be discouraging certain new housing...or infrastructure [because] they don't need it themselves – (Local Stakeholder, Planning, Harrow)

ii. Design

There was a general consensus across all four local authority areas that planning could exert significant influence over the exterior design and interior layout of new properties, and that both of these factors could potentially be utilised in order to meet BAME housing needs. Participants in Bradford and Harrow were able to give examples of where this has already been done.

... A lot of people that may be put into affordable housing tenure, due to cultural reasons, prefer to have separate cooking areas compared to eating and living areas, so we can try to influence the arrangements of houses... [For] larger intergenerational households which are maybe more predominant in BAME groups... larger household types in terms of three or four bed dwellings [is] something which we can influence as well – (Local Stakeholder, Planning, Harrow)

[The BME housing association] were building properties that were culturally appropriate for the South Asian community...where there was a separate living room [and] dining room...Particularly things like the direction of [the properties] as well and separating out toilets [and] facilities like that. That was influenced by [their] desire to build properties that were meeting the needs of the community... [S]o if you know you're actually targeting a particular community, then the planning systems can then be used to meet that need – (Local Stakeholder, Housing, Bradford)

In Bradford in particular, participants made reference to a local design standard as being a useful tool for ensuring that local housing needs are met by developers, and that this has positive implications for BAME groups as well when high-quality design is achieved.

[W]e've got the housing design guide... I've mentioned space, but we also talk about accessibility...we stipulate that we want to see an increased number of accessible homes delivered as standard... In terms of the demographics [and] statistics, a number of our BAME community or households will have elements of disability within the family, so it can disproportionately affect our BAME communities – (Local Stakeholder, Housing, Bradford)

There were certain circumstances in which local influence over design was felt to be stronger or weaker, for example relating to the scale of the development in question, or the statutory targets set by government for land supply for housing delivery.

[C]ertainly in larger scale regeneration...developers would do much a more extensive consultation with the local community. Really inform the design through that process... [W]here you've got maybe 20 houses on a site, often the developer would identify its own design and scheme, and the room for I suppose influence would be less or quite marginal – (Local Stakeholder, Housing, Bradford)

Generally we do have quite a lot of influence [over new developments]...[W]e're not begging either, because we have our five-year land housing supply. It's not like a standard authority, we're not under a watch from the government to say that we have to grant permissions because we're not meeting our five-year land supply. So we...do try to ensure that the developments are high quality and meet the needs of the community – (Local Stakeholder, Planning, Harrow)

One planner also pointed out that whilst they could try and design housing that met the needs of specific groups, they could not ultimately influence who ended up living in such properties.

Well, I suppose the fundamentals...around what we don't get involved in is, who buys or goes into the end property? All we can influence is the type; mix...that level of offer... In a sense all we can do - and it's probably the right approach - is to set a framework which delivers the mix that hopefully could meet some of those needs. Ultimately beyond us giving permission and it being built, it's very difficult then to say what actually happens with that housing, ultimately who does it go to? – (Local Stakeholder, Planning, Bradford)

Overall, though, the design of new properties was an element of planning which it was felt that planners could influence in order to provide housing that is suitable for the cultural needs of BAME groups, if this need was identified.

iii. Location

It was thought that planning and housing policy could influence the location of housing for BAME groups to an extent, by stipulating in local spatial strategies what would be considered suitable developments for certain locations.

We do get involved in determining the demand for particular areas, and the types of properties that they might want to build in those that meet the needs of the communities that it's going to serve – (Local Stakeholder, Housing, Bradford)

Participants also felt that planners could have more influence over the type of development on a site if the land in question was in local authority ownership. However, across all four local authorities, land

availability was cited as a constraint to delivering new housing developments of all kinds, but particularly in inner city locations due to a lack of brownfield sites.

Some of the challenges of then meeting [BAME housing needs] is we haven't got the land sometimes where some of the communities would like to remain or go to. We paint the picture of the type of mix, and we've got that in the policy, but then the practical issue of... "how do we actually deliver that?" becomes quite difficult – (Local Stakeholder, Planning, Bradford)

[We] have got a [joint venture] that we're just entering into which is the guts of 1700 homes I think. So, we have more influence over that because we're... bringing that land to market, but once you've exhausted that land supply it's incredibly difficult to rely on the private sector entirely – (Local Stakeholder, Housing, Harrow)

Therefore, planning can have some influence over the location of new housing developments aimed at BAME communities if there is suitable land available.

iv. Quality

Similarly, it was felt that planning can influence the quality of housing for BAME communities to a certain extent, with most perceived success focussed on new-build properties. In Lambeth, the regeneration agenda was argued as being focussed on holistically improving the quality of accommodation for the residents of council estates earmarked for demolition.

We've got some estates that are actually not quite fit for purpose in terms of what we'd want from an estate, so the quality of the stock, but also just things like the layout and the build. So looking at how we can improve those estates. I think that whole development arm and regeneration arm is very, very important for Lambeth – (Local Stakeholder, Housing, Lambeth)

However, there was also an acknowledgement that BAME residents are often housed in the private rental sector, in older, poorer-quality housing stock. In Bradford and Harrow, the local authorities have PRS partnerships that seek to regulate how people are housed in private rented accommodation, however there was not a consensus on whether planning's general influence over the existing private rental sector could be considered particularly strong; some participants felt that HMOs and licensing tools could be used to regulate quality, whilst others were more uncertain about whether this was a useful approach due to concerns around further restricting housing delivery.

[T]he more properties we can get licenced the better, but we don't want that to act as a disincentive for landlords, because that [could] push a lot of them underground again. So I think it's about [not using] words like rogue and ...supporting them and...enabling them to become a good landlord. [W]e're heavily reliant on the private-rented sector because we don't have enough council housing. So I think we need to just work in partnership with them [and] get them to raise their standard – (Local Stakeholder, Housing, Lambeth)

Obviously [planning/housing has influence] to some extent over the quality of private rented accommodation with the licensing approach. The problem is if you enforce high standards, what happens is people want to charge more rent to recover their costs and then that can have a negative impact on that supply of more affordable private rented accommodation – (Local Stakeholder, Housing, Harrow)

A level of concern was also expressed in all areas surrounding new Class E to residential permitted development rights². There was a fear that these conversions may lower the quality of rental stock, with one argument suggesting that if such conversions are taken further out of the remit of planning, it is consequently more difficult to influence them. Two participants explicitly linked this problem to a lack of choice of accommodation for certain groups.

[W]hat you're going to get [with permitted development] is people who don't have a choice about where to live. If you want to stay in this area, you can stay here, but don't worry, it's got a crappy little window, so you'll be fine... Someone who is doing better for themselves will choose not to live there... I really think it's that people in planning...forget those who don't have a choice – (Local Stakeholder, Planning, Lewisham)

[W]e've got a real problem with [office to residential conversions] in Bradford [which] have taken place...outside the planning process because it's permitted development. Our housing standards team often get involved...but after they've been occupied... [We] find a whole plethora of [challenges] and have to then address it through an enforcement route. Again, not necessarily affecting BAME communities, but very much could be because...it's low-cost accommodation – (Local Stakeholder, Housing, Bradford)

Like the location of properties, then, it was felt that the quality of homes could be influenced through planning with regards to new build properties, but that it is harder for planning to regulate the quality of existing housing, particular in the private rental sector. In Lambeth, the higher quality associated with new builds means that estate regeneration has been argued to be the most effective way to improve the quality of housing for BAME residents in existing council estates – however there remains strong opposition to this agenda amongst both local and national campaigners.

v. Viability and affordability

The housing issues over which planning was felt to have significantly less influence were the economic viability of new developments for the developer, and in turn over the genuine affordability of new homes for poorer residents, particularly in London where the market value of land and property is much higher than other parts of the country.

We don't get 50 per cent affordable housing on many sites after you've gone through your financial viability assessment. If we were to get 50 per cent affordable housing on all the housing that was built in Harrow we would have a lot more to meet demand than we currently do and that would make a significant difference – (Local Stakeholder, Housing, Harrow)

[W]e do employ external viability consultants to interrogate it, but at the end of the day, those viability consultants work for the developers too. They've got both hats on, so it's trying to keep everybody happy – (Local Stakeholder, Planning, Harrow)

Furthermore, a stakeholder in Harrow highlighted that those residential conversions carried out under permitted development rights are not only exempt from the usual quality standards, but also from standard affordability requirements.

"[I]f you look at permitted development for example and the amount of that that's happened in Harrow, none of which is subject to any affordable housing

² Refer to page 17 for a full explanation of these new permitted development rights.

requirement,...we've lost out [on] a significant amount of affordable housing that way" – (Local Stakeholder, Housing, Harrow)

National policy was predominantly felt to be the driver of these issues, with one participant suggesting that there was an inherent limit to how far affordable housing quotas for new developments could be pushed without being rejected at a higher level.

I think land values is something that really...makes things difficult in terms of general affordability and that sort of thing. Sometimes I think maybe some of the general government policies that are set at a national level may impact upon what we can do at the local level – (Local Stakeholder, Planning, Harrow)

[We] introduced [a] policy to stop the conversion of large units into lots of small flats. We did a standalone evidence base to say, 'This is what we need, so that we can have sustainable communities.' We've lost huge numbers of appeals as soon as that's taken to the Planning Inspectorate, because you know, the market. People say, 'It's large, so I want to charge £1.5 million for it.' Well, maybe it's not worth that. – (Local Stakeholder, Planning, Lewisham)

Viability was also seen to be a problem in Bradford with regards to developing housing to meet a particular need. However, the issue manifests itself differently due to the low property values in the area.

"We've got some of the smallest house value prices in the country, probably. That causes a problem in particular for building because...for our development we [the housing association] have to do an options appraisal on each scheme. Sometimes that development might not wash its face, because you look at the cost to build, by the time you've purchased the land and you factor that...against what the property's worth afterwards... sometimes it just does not stack up" – (Local Stakeholder, Housing, Bradford)

Therefore, the features of the current national planning system and the nature of external market forces were felt to have an impact on the viability of developments subsequently their affordability for residents, which local planning departments could not influence to a great extent.

The future role of planning in meeting BAME housing needs

Having considered the role that planning currently plays in addressing BAME housing needs in the case study areas, this chapter will now explore whether participants felt there was a future role for the planning system in attempts to alleviate racial inequality in housing, and what this might look like.

One participant felt that the scope of the planning system has been eroded in general and therefore, without reform, there would perhaps not be a future role for the planning system in seeking to meet the housing needs of BAME groups. Others felt that the constant changes that are being implemented within the planning system are already difficult for planners to keep up with, and that with current levels of capacity and resourcing, it would be difficult for planning to incorporate another statutory agenda.

I think that the planning system has been denuded of its powers over the last 25 years. [When I started out] I probably thought, there's a lot of potential here...

Actually, 30 years later... I barely look at planning documents. I think, what's the point? – (Local Stakeholder, Independent, Lambeth)

I don't think [there would be capacity to focus on BAME issues], not at the moment. Not when we've got all of this stuff coming through, with the White Paper changes, completely, to the whole planning system... It just feels like it's a constant churn of changes that [I think we] need to settle in with before there's any more. I don't think the system can take it – (Local Stakeholder, Planning, Harrow)

Nonetheless, most participants felt that the planning system does remain at least somewhat important in a discussion of how to reduce racial inequalities in housing and meet BAME housing needs due to the key role that it plays in the delivery of housing. Despite the ongoing changes to the planning system, a number of participants felt that if an agenda of this kind were to be set out by central government, local government would need to take account of it. Appropriate resourcing and funding would however be required alongside this in order for local authorities to give proper consideration to any proposed changes.

I think there has to be the understanding and an acknowledgment from a national level...that the current planning system does not necessarily address the racial inequalities or the BME housing need that is out there – (Local Stakeholder, Housing, Bradford)

If there was an explicit statement saying we need to specifically take into account BAME groups, and here's some guidance in terms of how it should be done, and you need to be able to demonstrate that you have done that, then yes, that would certainly sharpen the focus. [I]n some instances it may not actually change too much because it's already been addressed, but not as explicitly...but then other instances, it may [show] where we might be missing things as well – (Local Stakeholder, Planning, Harrow)

In Bradford, there was greater support for a more local approach to tackling these issues, and a feeling that if central government could allow greater flexibility within the planning system, this may be one way to enable local authorities to better deliver housing that meets local needs.

I think the local authority just being more lenient in terms of understanding what the needs are and trying harder to fulfil those needs. Even if that means releasing land that they might not ordinarily release... Obviously because of red tape within national and local housing regulation it's just difficult to be able to build on that land – (Local Stakeholder, Housing, Bradford)

Certainly, my ethos on the planning locally is, never mind what government does in a sense. We just need to do what we need to do locally through our evidence, our partnership working, our interventions... See what we can do to influence things I suppose in the here and now and going forward – (Local Stakeholder, Planning, Bradford)

However, the issues of viability of new developments and the genuine affordability of housing for residents were felt to remain beyond planning's control in all case study areas, including Bradford. It was felt that in order to tackle affordability issues in particular, this would potentially require reforms to welfare policy, immigration policy, social housing build programmes, and even a holistic culture change within central and local government to prioritise racial equality issues.

It's money to build the housing and to get people into a home. I think what that is doing though is it's treating the symptoms but not the cause. In my role, I can't change society and what has led people to be stuck in this cycle of deprivation. The majority of those people stuck in that cycle are BAME communities, so there needs to be a systems-wide approach to that, there really does, but from this, if you give people access to a safe home where they feel secure, then they have a better chance in life – (Local Stakeholder Planning, Lewisham)

Conclusion

In conclusion, whilst three of the four local authority areas included specific information on the housing needs of BAME groups in their respective SHMAs, this was not felt to translate to an explicit focus on these needs in planning policy in any of the areas. Housing staff were more likely to suggest that housing strategy had a focus on these needs, however this was subsequently acknowledged as often being implicit within housing policies seeking to meet the needs of all local residents: in Harrow this was identified as being part of affordable housing policies, and in Bradford as part of a 'homes for all' agenda. However in contrast to the other areas, external consultation in Bradford led to an explicit reference to particular cultural needs being included in their housing strategy (albeit a short reference).

In terms of the factors that may affect whether the housing needs of BAME groups are considered in local planning and housing strategies, leadership from local politicians was seen to have an impact in all areas, though no examples were given of where this leadership has been used to positively impact on BAME housing outcomes to date. In Bradford, leadership from local housing providers has led to the development of residential properties that seek to meet the housing needs of BAME groups; however, it was also acknowledged that the council had shown leadership in inviting partnership working and being amenable to approving these developments. Alongside local leadership, the availability of evidence to justify a more explicit policy approach to meeting BAME housing needs was also a factor; it was felt that very strong evidence would be needed in order for planning to be seen to be going against its remit of meeting the housing needs of all residents, especially in the context of discriminatory attitudes amongst some sections of the population leading to particular opposition to developments perceived to house BAME or low-income groups.

Overall, it was thought that there are 'soft' tools within the planning system which can enable local authorities to influence the availability of evidence on the housing needs of local BAME groups and to act on this evidence were this deemed to be appropriate. It was also felt that it was feasible for the planning system to have an influence over the design of new developments in particular and that this could be utilised to meet cultural requirements from housing; this has been done positively in Bradford and Harrow. In terms of the location and quality of housing for BAME residents, it was felt that planning could influence these to an extent, with constraints identified in all the case study areas around the availability of land and the ability of planning to regulate the quality of existing housing stock rather than just new builds. The areas in which the local planning authorities were felt to have limited influence were over the viability of new developments and the genuine affordability of housing for local residents.

In terms of the future role of planning in meeting the housing needs of BAME groups, some participants felt that this would be a struggle for a planning system which is constantly having to understand and incorporate policy changes on a variety of topics such as affordable housing targets or fire safety regulations. However, it was also felt that planning will remain an important policy area in this regard due to its fundamental role in the delivery of housing. Some participants, particularly in

London, felt that a central government directive requiring councils to address the housing needs of BAME groups would force them to do so in the same way that they must now take account of other statutory requirements; however it was felt that this perhaps would not be meaningful unless appropriate resourcing and funding was provided to avoid it becoming another 'tick-box' exercise for local authority planning and housing teams. In Bradford, however, there was more emphasis placed on allowing more flexibility within the current system to enable local authorities to meet the housing needs of local residents in the way most suitable for them.

Finally, participants in all case study areas argued that the planning system alone could not improve the genuine affordability of housing for local residents, and that therefore any planning reform in this regard would need to come alongside new social housing programmes and welfare reform, and that this would require a holistic approach from central government and a culture change in the current national approach to issues of racial equality.

6. Conclusions and Recommendations

This research aimed to find out the extent to which the English planning system is effectively addressing racial inequalities in housing and meeting the housing needs of BAME households. A review of the existing literature concluded that planning as a profession has continually failed to contend with issues of racial equality and relate them to its practices; this research therefore sought to update the evidence base by finding out if this is still the case.

Key findings

The findings of this research indicate that the English planning system continues to produce the socially conservative outcomes repeatedly identified in research over the past several decades. It is evident that tackling racial inequalities in housing and meeting the accommodation needs of BAME households are not explicit aims of planning at present, nor are these issues being considered in practice. While in most case study areas planning authorities did consider the needs of ethnic or faith groups in their SHMAs, this did not translate into specific policy aimed at addressing this need. This was due in part to a feeling that planning departments must not be seen to be prioritising the needs of certain groups over others. This naïve approach to ‘equalities’ (i.e., focussing on equality of treatment rather than equality of outcomes) has been identified and challenged by planning researchers for over 40 years, and will continue to reinforce existing disparities and discrimination within planning processes if it remains unchanged.

It must be acknowledged that there are some factors associated with racial inequalities in housing which local planning authorities simply struggle to influence. Firstly, it is difficult for planning departments to improve poor-quality existing housing stock which is often inhabited by BAME families due to the cheaper costs associated with it. Secondly, the placement of new housing developments remains reliant on land being or becoming available in suitable locations. Finally, local planning authorities cannot ultimately control whether the requested numbers of affordable housing will be accepted following a viability assessment, and whether any affordable housing that is delivered is *genuinely* affordable for the average resident. In addition, the persistence of inequalities in housing remains, of course, tied to problems of poverty and low incomes. Increased social housing provision and reforms to welfare systems in order to give BAME households more choice of suitable housing that meets their needs are thus essential to any attempt to address racial inequality.

However, despite these limitations, the planning system is a critical tool in addressing racial inequalities in housing as it is the key mechanism for delivering new homes in England and has significant untapped potential in tackling this form of social injustice. It does not follow from the lack of progress on these issues to date that the planning system cannot play a substantial role in addressing social injustices impacting BAME groups in the future, and any improvements made in pursuit of this aim could add real value in an effort to tackle such issues holistically across multiple policy areas.

This research has identified a number of specific ways in which the capacity of the planning system to meet the housing needs of BAME groups could be enhanced. To begin with, the National Planning Policy Framework (NPPF) should be updated to include a core focus on tackling racial inequalities and meeting the needs of BAME groups; having this central requirement running through all planning policy would compel local authorities to better address these aims in every aspect of decision-making. This would therefore help to prevent equalities considerations from remaining ‘tick-box’ exercises and would put greater emphasis back onto ‘who’ planning decisions, particularly relating to housing, really affect.

Existing tools such as equality impact assessments (EqIAs), strategic housing market assessments (SHMAs) and public consultation requirements could be used more explicitly to pursue the goal of meeting the accommodation needs of BAME households. This would in part depend on Government issuing more robust guidance and/or directives on how local authorities could or should use these tools with this aim in mind, and also on local planning authorities having the staff, skills and resources to collect accurate data on these accommodation needs. EqIAs should be coupled with a statutory requirement to take account of any findings felt to have adverse impacts on any groups with protected characteristics.

Finally, public consultation opportunities within planning urgently require improvement and refocussing to include a more diverse range of voices within decision-making processes. Worryingly, it seems that the manner in which consultation processes work at present often reinforces rather than challenges existing power inequalities. In particular, BAME groups and others who are marginalised or on low incomes seem much less likely to engage as they can often lack the spare time to devote to participating, an awareness of how to get involved, or the specialised knowledge needed to understand documents that include language specific to planning.

Increasing engagement is likely to require dedicated and properly resourced outreach work. Examples were given of how diversity of respondents has increased since consultation processes were held online during the pandemic. In Bradford, consultation processes including local housing providers, BME housing specialists and community faith leaders had positive outcomes as they led to a reference to cultural housing needs being included within the local authority's housing strategy, and the design of regeneration projects being changed to better meet such cultural needs. Therefore, it is possible for stakeholders to have meaningful involvement in consultation processes if leadership is shown on this issue.

Policy and practice implications

There are a series of recommendations arising from this study aimed at central government, local authorities, planning and housing professionals and their umbrella bodies, and universities.

Recommendations for central government

- Mainstream equalities considerations throughout any proposed planning reforms. This would compel local authorities to take account of issues of racial equality in all planning decision-making and therefore prevent these considerations from being simply a tick-box exercise.
- Expand the National Planning Policy Framework's presumption in favour of sustainable development to include an aim of striving for racial equality in all planning processes, so that this overarching aim can feed into all aspects of the planning system.
- Resource local planning authorities to keep up-to-date records of housing needs in their area and to prevent a reliance on outdated records in between censuses.
- Attach a clearer statutory duty to equality impact assessments (EqIAs) that obligates local authorities to act on any findings that reveal adverse impacts on groups with protected characteristics.
- Equalities and Human Rights Commission should issue clear guidance to local authorities specifically detailing the requirements of the public sector equality duty (PSED) as regards to planning policy and practices.

Recommendations for local authorities

- Include specific information of the needs of ethnic and/or faith groups when conducting a strategic housing market assessment (SHMA). By doing so, planning departments would develop a better understanding of the housing needs of their BAME residents when completing their SHMA and this could then provide the evidence needed to pursue a specific focus on the housing needs of BAME groups in planning policy.
- Actively undertake outreach work in order to ensure that the views of BAME communities are included in public consultation opportunities, including producing documents in different languages, and liaising with established community leaders who can act as mediators between the council and the wider community. Whilst this may serve as a good starting point for increasing engagement, councils should not assume that this will be sufficient to ensure all community views are represented; efforts should also be made to promote the inclusion of more marginalised members of BAME communities, such as children and young people, women, and low-income or homeless households.
- Continue to utilise new online forms of consultation, which have led to increases in public engagement during the Coronavirus pandemic, whilst also maintaining an awareness of who may be affected by the wider issue of digital exclusion.
- Work in partnership with any specialist BME housing providers operating locally, and also any housing providers known to house large numbers of BAME or low-income residents, to foster mutual learning and to share data and information on the needs of BAME groups.
- Include references to any cultural needs of local BAME groups in any local design guidance drawn up.

Recommendations for planning professionals

- Planning professionals and the planning system as a whole should abandon naïve attachment to formal equality of treatment and accept that proactively addressing BAME housing needs and racial inequality is necessary to achieve more socially just outcomes.
- The Royal Town Planning Institute (RTPI) should continue to pursue their “Change” Action Plan³ to increase equality, diversity, and inclusivity in the sector, and should provide guidance for local authorities detailing how they too can increase diversity in the planning profession. This should go beyond junior or entry level roles and seek to ensure that both diversity and the skills needed to take real account of equalities issues are also increased in senior roles and positions of leadership.
- The RTPI should work with external stakeholders in housing, race equalities, and academia to develop educational resources on ‘race and planning’ which can be accessed by local authorities and planning professionals.
- Planning professionals in local authorities should issue guidance and information for local communities on the requirements of the PSED so that they can hold local planning authorities accountable should they fail to adhere to this duty.

Recommendations for housing professionals

- Housing professionals should have the confidence to develop policies aimed specifically at meeting the housing needs of BAME residents where there is evidence that these needs are not

³ Details of the RTPI’s “Change” Action Plan for Equality, Diversity and Inclusivity can be found here: <https://www.rtpi.org.uk/new/our-strategic-priorities/equality-diversity-and-inclusion/change-action-plan/>

being adequately met. As with planning professionals, there must be shift away from formal equality of treatment and a willingness to actively promote equalities agendas where necessary.

- The National Housing Federation should support housing associations, particularly specialist BME providers but also those associations with large numbers of BAME or low-income residents, in lobbying for increased partnership working with local authorities.
- National Housing Federation should issue guidance to housing providers in order to raise awareness of how decisions relating to the design and location of new housing developments could inadvertently make such housing unsuitable to some BAME households.

Recommendations for universities

- Ensure that planning degree programmes includes teaching on how race equality and other social considerations are relevant to the study of planning, including education on the limits of formal equality of treatment in addressing systemic inequality and disadvantage.
- Make efforts to raise the profile of the planning profession amongst a diverse range of potential students from BAME and low-income backgrounds, e.g. by providing targeted bursaries or financial support.

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Appendix 1: Topic Guide for Key Informant Interviews

The role of the English planning system in addressing racial inequalities in housing and meeting the needs of BAME households Topic Guide for Key Informants

Introduction (before recording)

- I'm conducting a study into how the English planning system currently operates to address racial inequalities in housing and meet the needs of BAME households and looking into how it could perhaps operate more optimally in order to achieve these aims.
- I'm speaking to a number of key stakeholders at this initial stage of the research in order to get a broad overview of the national picture and to inform my choice of case study areas for further analysis.
- My first questions will be about how the planning system is currently operating, and then I'll ask about how it potentially could operate, and then finally there'll be some questions about forces outside the planning system that might be relevant in this space.
- Thank you for returning the signed consent form, do you have any questions at this stage about anything on the information sheet or otherwise?
- I'll switch on the recording now and I'll ask you again to confirm your consent on the record, and then we'll get started!:

1. Introduction

- Can you tell me briefly about your current job/role?
 - Do you have a particular area of specialism?

2. The planning system

I'm aware that there may be some questions that I'm going to ask you that might be more or less relevant to you based on your role(s) and your own expertise, so please just let me know if there are any questions that you don't have very much to say about.

- What is your overall impression of the role that planning currently plays in addressing racial inequalities [in case study area]?
 - How important is the planning system, if at all, in addressing racial inequalities [in case study area] as it stands?
 - How prominently does addressing racial inequality feature in national planning policy/guidance [in case study area]?
- Is it possible for the local authority to use features of the current planning system to address racial inequality in housing and meet the needs of BME households? Probes:
 - Equality Impact Assessments
 - are these an important tool to reducing racial inequality/meeting housing needs of BME households? Why/why not?
 - Are you aware of any local authorities that monitor outcomes of planning applications based on ethnicity?
 - Are you aware of any implications of the Public Sector Equality Duty on planning?
 - **To what extent** do local authorities actively use these tools/features to address racial inequality/meet BME housing needs in day-to-day practice?
 - Are the goals of reducing racial inequality/meeting BME housing needs on the agenda for local authorities? Are these prominent issues? Probes:

- do local authorities see racial equality as relevant to planning policy & practice?
- do local authorities typically think about how different ethnic groups might have different housing needs?
- Why are they/aren't they on the agenda?
- Is there a lot of variation in the focus on this in local authorities across the country?
 - If so, in what ways does LA practice vary?
 - Can you give some examples at the extremes?
 - Where do most LAs sit on that spectrum?
 - What drives that variation?
 - What factors are associated with especially proactive efforts to reduce RI/meet BME housing needs?
 - Probe: in particular, city v rural, north v south, political leadership, nature/scale of BAME pop, etc.

3. Best-performing local authorities

Having talked about general patterns, it would great to discuss some specific examples of good or best practice that you are aware of, potentially that other places could learn from...

- Have you come across any local authorities that are doing particularly good things in this space (reducing RI/meeting BME housing needs)? Probes:
 - Which?
 - What are they doing?
 - What's good about their approach?
 - Could other local authorities learn from them/are there transferable lessons? If so, why/how?
- Did the local authorities you've identified make use of any particular features of the current planning system in their good practice in this area?
 - If yes: how? Which tools/mechanisms? Why was that their focus/strategy?
 - If no: what tools/approaches did they use instead? Why do you think they worked outside of the planning system?

4. Improving the national planning system

I'd like to explore how you think the national planning system might be improved in this area:

- Do you think the national planning system could do a better job of enabling local areas to tackle racial inequality in housing and meet the needs of BME households?
- How could national planning system reform achieve this?
 - What features of the current planning system would need to change? Probe: e.g. better equality impact assessments? More alignment between housing/planning policy? More public consultation? Less discretionary system?
 - Which are the priorities/most important?
- How could better use be made of existing tools and approaches that the planning system provides to pursue these aims?
- Do you think potential changes like the ones identified in this conversation would improve the planning system overall?
 - If not, why not? Might they lead to any unintended consequences? What are the risks of pursuing that reform agenda?
- Are the issues (or solutions) you've identified applicable in all areas of England?
 - Why/why not?

- Are there any regional differences that particularly affect this?
- Do you have any thoughts on the 2020 White Paper ('Planning for the Future') in relation to this agenda of reducing racial inequality/better meeting the needs of BME groups?
 - What are the implications of the policies it [the White Paper] lays out for this agenda? Probe: replacement of CIL and section 106 agreements with new consolidated "infrastructure levy"; 21st century technology; simplification of local plans
 - Is there anything you think that wasn't included that should have been from a racial inequality/BME housing need perspective? Or anything that you think has been afforded too much/too little importance?

5. Beyond the planning system

The planning system is obviously only one mechanism via which to pursue these aims... I'm interested in your thoughts on how we should understand the role of the planning system in this area as compared/in relation to other policy areas.

- Even if the planning system in England were to operate at its most optimal in this area, to what extent would it be able to achieve racial equality/meet the needs of BME groups on its own?
 - what are the key constraints on the planning system's ability to achieve these aims?
 - Are these constraints the same across the country or not? If not, how do they vary?
 - What can be done, if anything, to reduce these constraints?
 - Which are the priority to address?
- What are the other key actions/reforms needed across other policy areas to achieve these things? Probe: immigration policy, housing & homelessness policy (social housing investment), equalities legislation, others?
- Overall, thinking about the relative role of the planning system and these other policy areas, where is our energy best directed in pursuing racial equality/meeting the needs of BME groups in housing?

6. Case Study areas

The next stage of the research will involve me conducting case studies in 2-3 local authority areas to explore these issues. I would like to conduct at least one of these case studies outside of London and between 1-2 within London.

- Do you have any suggestions of case study areas that could provide useful insight for the purposes of this research?
- If so, do you maybe have any contacts in these areas that you might be able to put me in touch with?
Thanks, I won't be able to contact everyone suggested but it's really helpful to have these options given to me!

I'd also welcome any suggestions that you might have about any other information that would be useful for me to consider in conducting this research, so

- Do you have any recommendations of reports or publications that would be useful for me to read in pursuing my research aims and questions?
- Do you have any other contacts that you think it would be useful for me to speak to in this initial stage of key informant interviews?
 - *Thanks, I really appreciate that, it's really helpful for me to have so many good suggestions, but sadly I won't manage to interview all of them, so I'll look at my overall list and I may come back to you and ask you to put me in contact with certain people if that would be okay with you.*

Appendix 2: Topic Guide for Case Studies

The role of the English planning system in addressing racial inequalities in housing and meeting the housing needs of BAME groups Topic Guide for Case Studies

Introduction (before recording)

- I'm conducting a study into how the English planning system currently operates to address racial inequalities in housing and meet the needs of BAME households, and thinking about whether it could operate more effectively in contributing to these aims
- I'm conducting three case studies to inform my research and I've chosen [Lambeth/Harrow/Bradford] local authority as one of them.
- I'm aware that there may be some questions that I'm going to ask you that might be more or less relevant to you based on your role(s) and your own expertise, so please just let me know if there are any questions that aren't relevant to you!
- Thank you for returning the signed consent form, do you have any questions at this stage about anything on the information sheet or otherwise?
- I'll switch on the recording now and I'll ask you again to confirm your consent on the record, and then we'll get started!:

1. Introduction

- Can you tell me briefly about your current job/role?
 - Do you have a particular area of specialism?

2. The planning system

So my first questions are about how the planning system is currently operating in [X] local authority and how issues of racial inequality and BME housing need may or may not be addressed through planning.

Openers:

- Can you tell me briefly about what the main challenges or issues are in [area] regarding racial inequalities? Probe: do any ethnic groups face particular housing challenges in [area]?
- What are the main strategic aims that [area] council is currently pursuing in their local planning policy? Probe: why are these the key focus/priority? What are the drivers?
- What are the main housing strategies that [area] council is currently pursuing? Probe: why are these the key focus/priority? What are the drivers?
- To what extent, if at all, is addressing racial inequalities in housing/meeting the housing needs of BME groups an explicit aim of the council's planning policy? Probe:
 - **If such aims are being pursued:**
 - Why is that? What are the drivers?
 - How specifically are these aims being pursued? Via which tools/mechanisms?
 - Equality Impact Assessments
 - Use of data on racial inequality/BME housing needs
 - Public Sector Equality Duty
 - Public consultation/engagement

- Others
 - How effective are these tools/mechanisms at achieving these aims?
 - Who undertakes these tasks? Is the data available that is needed? Sufficient resources/time?
- **If such aims aren't being pursued:**
 - What's your understanding of why that is?
 - Local political agenda
 - Funding/staffing issues
 - Awareness of issues among planning staff
 - A lack of relevant data
 - Data doesn't justify specific focus on BME groups?
 - Other?
- How prominent is the aim of tackling racial inequalities/meeting BME housing needs within the council's current planning strategies?
 - High up the list or behind other priorities? Why is this?
 - Perspective on how the council compares to other local authorities on this?
 - Leading light or lagging behind? Why are their differences? What allows [other] LA to do better?
- How prominently does tackling racial inequalities/meeting BME need related to housing feature in national planning policy or guidance?
 - How does this affect local authority action? Which national policy elements specifically have an impact?
 - Probe; London: does GLA policy effect how the council engages with these issues? Which GLA policy elements specifically have an impact?

3. Housing strategies/policies/practice

I'd like to think now about how planning and housing strategies may interact in this regard:

- To what extent, if at all, is addressing racial inequalities in housing/meeting the housing needs of BME groups an explicit aim of the local authority's housing strategy?
 - How prominent is it as compared with other objectives?
 - Possible explanations (lack of data, political will, resources, awareness etc)?
- How does the practice of local authority/housing providers impact on housing outcomes for BME groups?
 - Local authority homelessness policies and practice?
 - Housing needs assessments?
 - Council housing allocation and other policies?
 - Housing associations allocations and other policies? Any specific BME HAs locally?
 - Anything relevant in the practice of local private landlords?
 - Any evidence of discrimination by social/private landlords?
- Does the planning system have any tools to regulate how BME groups are housed in the PRS?
 - through HMO licensing? (as this may impact on some ethnic groups more than others?)
 - permitted development rights? Any way to regulate quality of residential conversions?

- How much influence does the planning department have over new housing developments [in area]?
 - Could planning potentially influence new developments in order to meet the particular needs of BME groups?
 - location
 - tenure (ownership; affordable; social rents)
 - interior plan (open-plan; number of bedrooms, etc.)

4. Improving practice in planning and housing

Having talked about the current response from local planning departments/housing providers to racial inequalities in housing and the particular housing needs of BME groups, I'd like to ask you about how you think practice could potentially be improved in this regard.

- What reforms do you think would make it easier for local authorities/housing providers to attempt to reduce racial inequality and meet the housing needs of BME groups through the planning system?
 - Better Equality Impact Assessments? Better local/political leadership? More funding/resources? Improved public consultation? Obligation from national level?
 - What are the priorities/most important?
- What sort of impact do you think these would have in your area?
- What difference, if any, do you think the 2020 White Paper ('Planning for the Future') will make to reducing racial inequality/better meeting the housing needs of BME groups?
 - What are the implications of the policies it [the White Paper] lays out for this agenda in [area]? Probe: replacement of CIL and section 106 agreements with new consolidated "infrastructure levy"; 21st century technology; simplification of local plans
 - Is there anything you think that wasn't included that should have been from a racial inequality/BME housing need perspective? Or anything that you think has been afforded too much/too little importance?

5. Beyond planning and housing

- Besides planning and housing, what other mechanisms or areas of policy would need to change to pursue greater racial equality in housing and to better meet BME housing needs?
 - Probe: immigration policy, equalities legislation, social housing, others?
 - Which are the priority to address?
- How important is the planning system relative to these other policy areas?

Thank you so much for your time, it's hugely appreciated – are there any other local contacts that you would recommend that I speak to for this study? Would you possibly mind putting me in touch with them if you have their contact details?

Appendix 3: Case Study Contextualisation

	Bradford	Harrow (outer LDN)	Lambeth (inner LDN)	Lewisham (inner LDN)
Local planning authority	City of Bradford Metropolitan District Council	London Borough of Harrow	London Borough of Lambeth	London Borough of Lewisham
Population density (ONS, 2021a)	1,480 people/sq. km	5,000 people/sq. km	12,005 people/sq. km	8,687 people/sq. km
Median price paid for a property, 2020/21 (ONS, 2021b)	£144,950	£495,000	£565,000	£447,500
Median monthly rent (all categories), 2020/21 (ONS, 2021c)	£550	£1350	£1645	£1250
% breakdown of households by tenure, 2019 (ONS, 2021d)	Own outright: 33.4% Own with mortgage/loan: 33.6% Private rent: 19.2% Social rent: 13.8%	Own outright: 35.2% Own with mortgage/loan: 32.5% Private rent: 22.3% Social rent: 10%	Own outright: 14.4% Own with mortgage/loan: 23.1% Private rent: 30.2% Social rent: 32.4%	Own outright: 18.3% Own with mortgage/loan: 28% Private rent: 25.2% Social rent: 28.6%
Gross disposable household income per head, 2018 (ONS, 2020)	£15,319	£25,442* *for Harrow & Hillingdon	£29,003	£25,046* *for Lewisham & Southwark
% non-white population, 2011 (ONS, 2018)	32.6%	69.1%	42.9%	46.5%
Largest non-white ethnic group, 2011 (ONS, 2018)	Asian (26.8% of residents) <i>Largest single group: Pakistani (20.4%)</i>	Asian (42.6% of residents) <i>Largest single group: Indian (26.4%)</i>	Black (25.9% of residents) <i>Largest single group: Black African (11.6%)</i>	Black (27.2%) <i>Largest single groups: Black African (11.6%); Black Caribbean (11.2%)</i>
No. of councillors by party, 2021 (Open Council Data UK, 2021)	Labour: 51 Conservative: 25 Lib Dem: 7 Green: 3 Ind/Other: 4	Labour: 35 Conservative: 27 Ind/Other: 1	Labour: 57 Green: 5 Conservative: 1	Labour: 53 Ind/Other: 1

About the I-SPHERE / Oak Foundation Internship Programme

The Oak Foundation is an international philanthropic foundation funding projects in conservation, human rights, abuse, housing, learning disabilities, and other social justice issues. In its Housing and Homelessness Programme, the Foundation focuses on preventing homelessness by funding sustainable solutions that improve the economic and social wellbeing of marginalised youth, adults and families. The Institute of Social Policy, Housing and Equalities Research (I-SPHERE) at Heriot-Watt University is a leading UK research centre in the fields of housing, poverty and social policy with a strong international reputation. I-SPHERE staff specialise in research on homelessness, destitution, complex needs and other forms of disadvantage. Oak Foundation and I-SPHERE run an internship programme to support the development of a stream of early career researchers to undertake high quality policy and practice applied research.

Find out more at: www.i-sphere.site.hw.ac.uk www.oakfnd.org

About the Author

This research was carried out by Amy Bristow, I-SPHERE and Oak Foundation Research Intern in 2021 and supervised by Suzanne Fitzpatrick and Beth Watts (I-SPHERE at Heriot-Watt University). It was supported by a Research Advisory Group that included: Huw Thomas (University of Cardiff) (chair); Sue Brownill (Oxford Brookes University); Sarah Lewis (RTPI); Cecil Sagoe (Shelter); Priya Shah (BAME in Property); Lara Oyedele (Olmec); Anna Minton (independent author and journalist); and Raji Hunjan and Paul Wishart, (Oak Foundation).

Amy Bristow was the fifth I-SPHERE Oak Foundation intern, completing her internship between November 2020 and July 2021. Amy completed her postgraduate degree in urban planning in 2020, and developed a particular interest in how urban planning may be used to tackle social inequalities after writing her dissertation on planning's role in mitigating the impact of infectious pandemics such as COVID-19. Amy is now working as a Planning Project Officer at the Improvement Service, where her role includes providing business support to Heads of Planning Scotland (HOPS), supporting the implementation of the Planning Skills Programme for local authorities, and assisting the Data and Intelligence Team in their work with planning data.

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