

LGBT+ Placemaking Toolkit

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Aim of the Toolkit

As we celebrate 50 years since the partial discrimination of homosexuality in the UK as well as the Stonewall riots in New York, it is worth reflecting on the fact that a lot of progress has been made in protecting and promoting LGBT+ rights in our society. The legislation which has been passed over the past 20 years, the decriminalisation of Section 28 of the Local Government Act 1988, as well as civil partnerships and equal marriage have done much to bring about greater acceptance for LGBT+ people in our society.

In our major cities we are fortunate that many LGBT+ people can live their lives openly in a way that was unimaginable 30-40 years ago. As we look forward to the next 20-30 years, what are the major challenges facing the LGBT+ community?

At Planning Out, we believe that strong communities are vital to ensuring happiness and wellbeing in the LGBT+ community. As planners we believe that the planning system and the built environment are vital for providing safe and engaging spaces where LGBT+ people can be themselves and celebrate who they are.

We believe that LGBT+ venues and businesses provide a rich and diverse array of facilities and services, not just supporting the lives of the LGBT+ community, but enriching the overall fabric of our society. However, a study released by UCL Urban Laboratory in 2017 ([LGBTQ+ Cultural Infrastructure in London: Night Venues, 2006-present, July 2017 - Dr Ben Campkin & Lo Marshall](#)) found that in the previous ten years alone, 58% of LGBT+ clubs, bars and performance spaces in London had closed, dropping from 125 to 53.

The reason for these closures are manifold and complex, and not confined to the LGBT+ community. However the responses to the UCL Urban Laboratory study “powerfully illustrate how the heritage of LGBTQ+ people is embedded in the fabric and specific cultures of designated LGBTQ+ venues and events. They also stress that venues are important spaces for education and intergenerational exchange” (Campkin and Marshall, 2017).

In London, the UCL findings have helped to inform the preparation of the Mayor’s [Cultural Infrastructure Plan](#). This provides valuable policy and decision-making support for the protection and promotion of creative and cultural areas, including for LGBT+ uses.

This toolkit is intended to build on the findings of these documents and be a resource for members of the LGBT+ community to better navigating the planning system. It aims to provide guidance and improve understanding of the various types of regulation in order to protect an LGBT+ venue from closure or re-development, to hold an event or festival, to temporarily use a space for community purposes or even fly rainbow flags.

The toolkit aims to provide a collection of guidance, best practice and further material that might be relevant to LGBT+ -oriented or -friendly activities, developments or uses, in order to ensure the LGBT+ spaces and places continue to form an important part of the social framework of our communities.

About Planning Out

Planning Out was established in London in July 2016. It is a forum run by and for LGBT+ professionals in the town planning sector to develop networks across the industry. We have over 500 members from the public and private sectors, in planning and related professions such as surveyors and land professionals, architects, transport planners, urban designers, planning lawyers and public affairs consultants.

Our aim is to provide a friendly, collegiate and supportive community within the planning world to encourage members to share experiences and feel comfortable being, or becoming, LGBT+ in the workplace and in their professional lives.

We also aim to influence the planning system through policy-making and best practice to encourage greater acceptance and visibility of the needs of the LGBT+ community.

Establishing and Protecting LGBT+ Places & Businesses

Local Plan-Making by Local Authorities

Local plans are framework documents which a local authority uses to guide how land in their area will be used and developed. Local plans also contain planning policies and guidance which are used to assess and determine compliance of planning applications with the local plan, such as affordable housing, open space and education requirements.

Local plans are important tools for establishing and enforcing strategic placemaking and policy objectives. Local plan policies can provide safeguarding and protection requirements and regulate the way that new development impacts on LGBT+ places and communities.

Generally-speaking, this safeguarding function has featured at the high-level plan-making stage. The Equalities Act 2010 requires public bodies to have due regard to various equality considerations regarding 'protected characteristics' (including sex, gender reassignment and sexual orientation) when carrying out their functions.

When making their local plans (which local authorities are required to do about every 5 years), the authority will usually carry out an Equality Impact Assessment which assesses whether the new local plan will have disproportionate detrimental impact on a group with a protected characteristic.

While this process is important to ensure that local plans do not unduly harm the LGBT+ community, it has not been able to stem the loss of LGBT+ places. More can be done to pro-actively promote and protect existing and new spaces and businesses through adoption of local planning policies and tools specifically aimed at promotion and protection.

UCL Urban Laboratory Recommendations

[The UCL Urban Laboratory Report](#) makes 12 recommendations (pp53-57) which we consider should be adopted as best practice by local planning authorities when carrying out their planning functions (including when making local plans and supporting documents). These include:

- measures that support the retention, re-provision and promotion of LGBTQ+ spaces should be included in local plans
- an Equality Impact Assessment should be conducted for any development which affects an existing LGBTQ+ venue or a venue that regularly hosts events designated for the LGBTQ+ community
- monitoring of the number and location of LGBTQ+ venues in a local authority's area
- provision of LGBTQ+ spaces as potential cultural and social infrastructure within new developments as they arise, working with LGBTQ+ community organisations to identify potential venue operators to work with developers
- develop criteria to define LGBTQ+ spaces of special heritage value to those communities.

Plan-Making - Case Study: City of Westminster

Westminster's [draft City Plan 2019 - 2040](#) explicitly recognises the unique cultural, artistic and historical significance of Soho, and creates the Soho Special Policy Area for the protection and promotion of, amongst others, LGBTQI+ venues in the Special Policy Area. This level of explicit protection and promotion of LGBT+ places in an adopted local plan is pioneering, and will hopefully set an example for other local authorities with recognised LGBT+ areas such as Manchester and Birmingham:

"21.9 Soho is also a centre with a high concentration of LGBTQI+ venues and they remain an important aspect of its character. The number of LGBTQI+ venues in Westminster has declined by 46% between 2006 and 2018, representing a loss of 16 unique venues. It is therefore important that we seek to retain existing, and encourage new, LGBTQI+ venues so that Soho remains a centre for the LGBTQI+ community."

Existing LGBTQI+ venues will be protected through this plan and new venues are explicitly encouraged within the SPA to ensure Soho retains its status as a centre of LGBTQI+ culture, retail and nightlife."

"Development in the Soho Special Policy Area will reflect its unique character and function and demonstrate how it respects, protects and enhances the existing scale and grain of the built environment and the unique mixture of uses present there."



The London Plan

In London, the Mayor must produce a strategic planning document for Greater London. Each local authority's local plan must be consistent with the Mayor's London Plan.

The current adopted plan is the 2016 Plan, but the draft new London Plan is being prepared and expected to be adopted in late 2019. This toolkit is based on the new London Plan as it is in an advanced stage of the plan-making process, and a material consideration in planning decisions.

Alongside policies and strategies in the current London Plan and draft new London Plan, the Mayor has also produced a range of tools and resources that can be drawn upon by both local authorities and applicants in various planning situations.

Whilst only legally binding in Greater London, the documents below contain a wealth of guidance, examples and best practice:

[Culture and the night-time economy Supplementary Planning Guidance](#)

This planning guidance offers guidance and case studies on how to implement current London Plan (2016) policies to protect and enhance culture and the night-time economy.

[Draft New London Plan – Policy HC5: Cultural Quarters, Creative Enterprise Zones](#)

This policy requires local authorities to support the continued growth and evolution of London's diverse cultural facilities through the protection of existing cultural venues, and identifying and promoting new facilities, including the use of 'Creative Enterprise Zones'.

[Draft New London Plan – Policy HC6 Supporting the night-time economy](#)

This policy requires local authorities to develop a vision for the night-time economy (between 6pm and 6am) to protect and support evening and night-time cultural venues such as pubs, night clubs, theatres, cinemas and music and other arts venues, supporting growth and diversification.

[Cultural Infrastructure Plan](#)

An action plan setting out how London can support and grow cultural spaces with a [Toolbox](#) containing further research, tips, resources and funding opportunities.

[An A-Z of Planning & Culture](#)

Short guide 'demystifying' the various planning tools available to support and sustain cultural venues.

[LGBT+ Nightlife Venues Map](#)

An annual audit by the Greater London Assembly of venues as spaces designated as primarily LGBTQ+ and/or with primarily LGBTQ+ programming.

[LGBT+ Venues Charter](#)

A five-point pledge for operators, developers, pub companies, property owners and others to show or affirm support of London's LGBT+ pubs, bars, clubs and other venues.

For more information on how local plans are made see the Planning Inspectorate's information on [Local Plans](#).

Town Planning & Making a Planning Application

An application for an LGBT+ pub, club, café, restaurant – or any other use – must be made in the same way as any other application; the characteristics of the customers or users of a place is not a determinative consideration in whether planning permission should be granted. Various factors such as impacts on amenity, transport and traffic, noise and other disturbance will always be the 'relevant planning considerations for deciding an application.

You should always seek the advice of a planning consultant when starting a new use, or changing an existing one. Planning permission may not always be required – for example if the use or activity is continuing an existing use, or is very similar to, or of the same [use class](#) as the existing use (e.g., bar, restaurant, retail unit).

Whether or not your use, space or venue requires planning permission will depend on whether that use – if it is new – is materially different to the existing use.

When applying for any planning permission for an LGBT+ venue, it is advisable however to apply for a 'sui generis' use class, which specifies that the use of the premises is for a specific mix of uses which cross over, or are not already included within the established classes (see the Royal Vauxhall Tavern case study below). This means that the use will not fall within a general use class that might permit changes to the use without the need for planning permission.

Any subsequent owner or operator would need to apply for planning permission to change the use from sui generis – thus affording the opportunity for representations, objections and negotiations by the LGBT+ community to protect that LGBT+ use, or seek conditions or planning obligations on the new permission as discussed below

The Government's [Planning Portal](#) contains a useful [summary](#) of when you might require planning permission and [how to make a planning application](#).

Planning conditions and obligations

A planning permission cannot specifically approve or require any venue or use as an LGBT+ use – it will simply approve development for a [use class](#) or mixture of uses.

The [conditions and obligations](#) that can attach to a planning permission can, however, be used to more tightly prescribe the way that the use or development must be carried out.

A condition is used to regulate the way that a use or development is carried out in physical terms – how it is built, the materials used, when it can be operated. Planning conditions must meet various tests set out in the [National Planning Policy Framework](#) to be lawful – such as being necessary, relevant and reasonable to make the use or development acceptable.

Planning conditions are limited in their scope, and it is unlikely that a condition could be used to achieve any protections specifically for LGBT+ uses or activities.

[Planning obligations](#) are similar to conditions – except that they do not sit within the planning permission itself, but alongside it in a separate legal agreement between the local authority, the owner of the land, and the applicant for the planning permission.

Accordingly there is far more scope to negotiate a planning obligation with a local authority and attach specific provisions regarding the LGBT+ characteristics of the use – and use it to bind future owners and operators under the planning permission to comply with those provisions.

The first known example of a planning obligation being used in this way is in relation to the Joiners Arms – see case study below.

When seeking to include any LGBT+ protection in a planning obligation it is advisable to start discussions early with the local authority and with whoever is making the application (if relevant). A planning obligation is a legally-binding agreement that requires careful drafting in order to be legally compliant and enforceable.

It can however be a valuable tool for ensuring the continuing protection of an LGBT+ use or venue, particularly when used in combination with other planning measures to tailor a bespoke solution for an LGBT+ place.

Planning Obligations - Case Study: The Joiners Arms

The Joiners' Arms is an LGBT+ pub in Tower Hamlets, London, established in 1997. It was bought by a developer in 2014 who was seeking to demolish the pub and re-develop the site for residential, retail and employment uses.

[The Friends of the Joiners' Arms](#) group formed to resist the development, and it was successful in having the pub listed as an asset of community value (ACV - see section below) due to its significance to the East London LGBT+ community and its role in supporting LGBT+ performance and culture since its opening.

The Joiners Arms was closed by the developers in January 2015, and has remained unused since, but its re-development was permitted subject to various innovative requirements.

The ACV status required the developer to give greater consideration to the LGBT+ heritage of the site, and the Council required the developer to look for ways to use the planning process to protect the LGBT+ use.

Effective campaigning of the Council by the Friends led to the imposition of a bespoke package of planning measures allowing the developers to demolish the historic pub, but build a new venue which attempts to protect its use for the LGBT+ community. The developer agreed to a legally-binding planning obligation to provide a new space for the pub and:

- provide a time-limited Right of First refusal period for a suitable LGBT+ operator of the pub to be found grant a minimum lease length for a future LGBT+ operator of 25 years
- should the LGBT+ operator terminate the lease within that time, to repeat the Right of First Refusal procedure to allow for another LGBT+ operator to seek to take up the pub space

The Joiners Arms also enjoyed late-night hours of operation, which was also critical to the LGBT+ character. The Council engaged a noise specialist to formulate acceptable planning conditions regarding design and noise mitigation to ensure that the new venue would retain the Joiners Arms' late operating hours for the first 12 months of operation without causing harm to nearby residents.'



Agent of Change Principle

The introduction of the "agent of change" principle to national planning policy and London Plan is a welcome protection for existing LGBT+ business and community facilities from encroaching residential development. Where any new development is proposed that could be noise-sensitive (such as residential), and it could be adversely affected by nearby sources of noise such as music venues, community and sports clubs, then the developer of the new use bears the responsibility of protecting both the existing business and the new development.

The principle states that:

"Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed."

It is important that pre-existing LGBT+ uses and businesses pay close attention to notices and advertisements for surrounding proposed developments.

If your LGBT+ business or use is affected, you should take the time to specifically raise objections to any development that might threaten to encroach on the pre-existing LGBT+ use, referring to this principle.

In planning terms, increased engagement with the planning process will ensure that your voice is heard, and that you have the opportunity to influence the decision, or at least the design of the development, to accommodate LGBT+ neighbour/s.

For further information see:

- [The National Planning Policy Framework](#)
- [Planning Practice Guidance](#) - provides further information on how to mitigate the adverse impacts of noise

Agent of change - Case Study: The Nightingale Club

The Nightingale Club sits at the heart of LGBT+ Birmingham, and the surrounding streets and buildings have been used by the LGBT+ community for decades as a place to socialise and to host annual Pride celebrations.

A planning application for 116 residential units approximately 12 metres from the Nightingale Club was made in 2018. Members of the local community objected on the grounds that it would pave the way for noise complaints by new residents and detrimentally encroach upon the LGBT+ character of the area.

Birmingham City Council deferred the decision date in order to carry out a site visit and further noise investigations. As at June 2019, the application remains undetermined and a new committee date has yet to be set.



Licensing & business rates

Whilst licensing and business rates are not planning issues, they impact heavily on the regulation and use of a premises and are a critical factor in the success of a business or venue in a particular location – even if planning conditions can be met.

Punitive licensing conditions in particular can disproportionately affect LGBT+ venues, as they often comprise a mix of pub, club, entertainment and performance uses. Limiting any one of these uses can be harmful to the LGBT+ character of the venue.

The licensing regime established under the Licensing Act 2003 aims to prevent crime, disorder and nuisance and protect public safety by regulating the sale of alcohol, the provision of regulated entertainment or the provision of late night refreshment.

An operator of an LGBT+ venue requiring licensing under the Licensing Act 2003 will need to give careful consideration to the need for a license – and to their ability to ensure compliance. A detailed operating schedule must be submitted which sets out how the licensing objectives will be promoted, and be aware that serious penalties can be imposed for breaches including the permanent closure of a venue.

For further information see:

- [Government's Revised Guidance Issued Under Section 182 of the Licensing Act 2003](#)
- [GOV.UK Guidance on Entertainment Licensing](#)

Licensing - Case Study: Fabric

The famous dance club Fabric in Farringdon, London was established in 1999, and became an institution on the dance music scene that launched many acts that went on to commercial success. Whilst not explicitly an LGBT+ venue, the Fabric case is one which could have implications for similar venues which provide late-night music and entertainment.

After the drug-related deaths of two clubbers in 2016, Islington Council revoked the club's license, effectively forcing its closure, despite 17 years of operation without a breach of licensing conditions.

Fabric appealed the revocation, and at length was able to agree strict new licensing conditions with the Council which included extensive new security measures, covert surveillance, lifetime bans on patrons breaching the no-drugs policy, improved lighting and CCTV. The club was able to re-open, but with a much higher cost of compliance. Nevertheless it is an example of how a proactive approach to licensing issues can ensure continued operation – but when it comes to licensing, prevention is far better than cure.



For LGBT+ businesses and venues in urban areas, the density and popularity of the area is a blessing and a curse. A higher population brings a larger LGBT+ community, however ever-increasing property values and rents lead to higher 'rateable' values of property for business rates purposes. They are particularly burdensome on small business and hospitality uses (which account for many LGBT+ businesses).

Business Rates - Case Study: G-A-Y

The case of G-A-Y represents an innovative approach to protection of a LGBT+ venue threatened with closure due to spiralling rent and rates.

G-A-Y is an iconic LGBT+ club on Soho's Old Compton Street, the heart of LGBT+ London, which has been in operation for over 20 years. In 2017 the operator tenant was presented with a circa £400,000 rent and rates increase, from approx. £300,000 to £700,000 per year.

The operator applied for a one-hour extension of its license, allowing it to operate until 4am – the extra hour's trade over the course of the year would help to offset the increase. Westminster City Licensing Committee granted the application, specifically referencing the need to preserve the area's night-time economy.

This is a useful precedent that could be referenced in other appropriate situations, in combination with the argument that preservation of an LGBT+ business or venue is an important factor to be weighed in the decision-making process.



Flying/Displaying Rainbow Flags

The rainbow flag is arguably the most historically and culturally significant symbol of the LGBT+ community, and the most recognisable. The right to fly or display the flag is of great importance for LGBT+ places, organisations and individuals, whether as a welcome sign for a pub or venue, or as an expression of solidarity during Pride on an office building.

Flying a rainbow flag does not require any permissions from your local authority, provided certain requirements are complied with in relation to the size, number and location of the flag/s.

Different rules apply depending on whether the flagpole is situated vertically on a roof, projecting from another part of the building or located within the grounds of a building.

For more information see:

- Class H of the Town and Country Planning (Control of advertisements) (England) Regulations 2007 (SI 2007/783)
- [DCLG Guidance: Flying flags: a plain English guide \(November 2012\)](#)

Assets of Community Value

As LGBT+ venues continue to disappear, surviving venues gain even more significance. The ACV process can be a useful tool for safeguarding an historic and/or ongoing LGBT+ venue, or providing leverage when combined with other tools.

The ACV procedure gives local community groups a right to nominate a building or other land for listing by the local authority as an asset of community value.

It can be listed if a principal (“non-ancillary”) use of the asset furthers (or has recently furthered) the community’s social well-being or social interests (which include cultural, sporting or recreational interests) and is likely to do so in the future.

Assets will remain on the list for five years, and ACV status is registered as a local land charge on the property, and a restriction on title will be entered. When the five years have expired, the group can submit a new nomination. If the owner proposes to sell the property, they must inform the local authority, who will inform the local group who have nominated the asset. The local group then have 6 weeks to notify the local authority whether they wish to bid for the property, or else the owner can proceed with the sale.

If a group intends to make a bid, they have up to six months to prepare the offer, during which time there is a moratorium on sale. Although the owner is not obliged to accept the offer, this procedure does give a local community a first right to bid and buy time to attempt negotiations with the owner about preserving the LGBT+ attributes.

For more information see:

- [DCLG Guidance: Community Right to Bid: Non-statutory advice note for local authorities \(October 2012\)](#)
- In London: https://www.london.gov.uk/sites/default/files/draft_london_plan_chapter_7.pdf

Assets of Community Value - Case Study: Royal Vauxhall Tavern

The Royal Vauxhall Tavern (RVT) in London is the UK’s oldest LGBT+ venue. Its website notes that “It has a long tradition of hosting alternative cabaret and drag acts and has been an iconic queer space from before the decriminalisation of homosexuality, through the AIDS crisis and into the 21st Century.”

Built as a pub in 1860-1862, the RVT sits in a central area of London that has seen constant pressure from redevelopment of the surrounding areas. Nevertheless it retained its independence and character as a varied queer performance space and preserved the physical integrity of the original building.

In 2014 the RVT was sold to new owners, and fearing the intentions of the property developer owners, a community group called RVT Future was established. The group immediately applied to Lambeth Council to list the venue as an ACV, which was successful, and recognised the importance of its offering of performance, arts, burlesque, cabaret and music hall space.

As it became clear that the new owners intended to demolish and re-develop the RVT, the group sought to add further layers of planning restrictions, which have made it difficult for the new owners to execute any plans. These are:

- Grade II heritage listing (the first building to be listed for its LGBTQ+ historical and cultural significance as the last surviving London venue with a documented gay history predating the 1960s)
- Sui Generis planning status as a combination of pub, nightclub and performance space granted in 2016
- Extension to the Lambeth Conservation Area to include the RVT

The owners have consequently abandoned their own re-development plans and attempted to market and sell the RVT. RVT Future is in ongoing efforts to secure an acceptable bid proposal with the owners; in the meantime the owners have granted a further 20 year lease to the operator of the RVT to extend the current lease which expires in 2019.



LGBT+ Events & 'Pop Up'/Flexible Uses

Use of a venue or premises for an LGBT+ business, activity or event may only need to be temporary or flexible. The flexible or 'pop up' use of space is becoming increasingly prominent across all real estate sectors, including retail, commercial and residential. It is also a more economically viable option for many LGBT+ community groups or organisations that may not have the resources to buy or lease exclusive space, for example a start-up business, product launch, art/design exhibition, community meeting space or support service.

Use of a space that is already consistent with its approved planning use – and therefore doesn't require planning permission – will still need to comply with other regulatory regimes as applicable, such as alcohol and entertainment licensing, advertising consent and food and hygiene licensing.

Contractual issues with the landlord will also be relevant, such as the terms of the lease or licence, what are the rights and responsibilities for fit-out and reinstatement, and taking out sufficient insurance.

When considering using new premises for a flexible use or 'pop-up' use, the planning system does permit, in certain circumstances, a small amount of 'ancillary' or incidental use which is different to the approved use. For example, an office could be used occasionally for a charity group to meet and hold events without the need for any separate planning consent.

It is also possible to install a temporary structure on land without planning permission provided it is not going to be used for more than 28 days. For more information on permitted and temporary rights see the GOV.UK Guidance on [When Is Permission Required?](#)

The advice of a planning consultant should be sought if the use is likely to conflict materially with the existing permitted use in any event.

Flexible Planning Permission

For more long-term flexibility in use, a flexible, or 'dual use' planning permission may be appropriate. For example, an LGBT+ nightclub may also wish to operate as a café or restaurant during the day.

This type of permission requires a formal planning application, but it can specify two separate, different uses that can be used flexibly over a 10 year period, with no limitation on how many times the uses are switched, and requiring no further planning permission. Whichever use is in place at the end of the 10 years becomes the lawful ongoing use.

This kind of permission may be helpful to an LGBT+ business or organisation which wishes to retain options over the use of a premises, for example to ensure resilience and continuity of the LGBT+ nature of the space, secure extra income from sub-letting to short-term uses or pop-ups, or simply to try out one business model before switching to another.

Temporary Event Notices (TENs)

For short term or one-off events, such as a street party or small festival in your house or venue during Pride, a TEN is a convenient option that avoids the need to apply for a formal licence under the Licensing Act 2003. A TEN allows the carrying out of activities which would otherwise require a license (see section above), such as:

- selling alcohol
- serving alcohol to members of a private club
- providing entertainment, such as music, dancing or indoor sporting events
- serving hot food or drink between 11pm and 5am

The event must have no more than 500 people including staff, and not exceed 7 days in length. A single premises can have up to 15 TENs in one year, with a cumulative maximum length of 21 event days in total.

For more information see:

- [GOV.UK TEN guidance](#)
- GOV.UK Guidance - [Your guide to organising a street party](#)

Other Resources

Links to useful resources and services

[UCL Urban Laboratories Research Project Page](#) - LGBTQ+ nightlife spaces in London

[LGBT Consortium](#) - National specialist infrastructure and membership organisation focussing on the development and support of LGBT groups, organisations and projects

[Queer Spaces Network](#) - A support network of people from a wide range of backgrounds committed to supporting and developing LGBTQI+ spaces in London

[Raze Collective](#) - A charity established to support, develop and nurture queer performance in the UK

[Sound Diplomacy](#) - Consultancy specialising in strategic and policy advice regarding music/noise and night-time economy

[Queer Tours of London](#) - Educational, accessible and interactive walking tours, cabarets, street-art and events that tell the stories of London's queer history



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becg

built
environment
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group