



Design South East's response to the Planning White Paper

October 2020

Design South East's response to Planning for the Future

Design South East is a charitable organisation that helps local authorities and their stakeholders deliver well-designed places. Focussing on the wider south east, an area that comprises almost half of the country's local authorities, we are involved in a range of developments from garden settlements to high-density developments. We are also supporting the development of design policies, guidance and codes and developing the design management systems and skills of local authorities.

Our response to the Planning White paper consultation has been made following extensive engagement with our partners and clients including local authority planning and design officers, the private sector, design panels from London and the wider South East, and the nationwide Design Network. However, the views expressed in this response are Design South East's

Our views and recommendations

- **Promote a national step change in the volume and depth of public engagement**

We support the emphasis on community engagement in planning, and particularly the importance of participation early in the plan making and design coding processes. However, delivering 'provably locally-popular' design codes will require a step change in terms of the numbers of people participating and in the depth of their engagement. We recommend that the government sees this as an opportunity to transform public apathy about the built environment into passion by promoting a national conversation about the value of design and to foster greater depth of engagement by strengthening community skills and promoting collaborative production.

- **Use this opportunity to unlock the transformative power of design**

We support the commitment to a shared definition of good design but urge the government to see this as opportunity to democratise the true value of design as a vehicle for delivering social and economic value, contributing to public health and social cohesion, and enhancing ecology and biodiversity. This means explaining that this value derives from a complex set of ingredients including connections and movement, setting and layout and response to context; beauty that is more than skin deep.

- **Prioritise the development of design management systems in which codes sit**

We welcome the emphasis on building quality places, and while we support the use of design codes, we recommend the government prioritises the development of design quality management systems within which codes sit.

- **Build a design led planning system on existing best practice**

We support the use of 'exemplars' in the White Paper but recommend that the critical factors are highlighted and the best practice that underpins well designed developments (including but not limited to design codes) are used as the foundation for the transformation to a new system.

- **Empower local planning authorities to demand well designed places**

Properly resourced local authorities are best place to deliver well designed places, but the government must to clarity for local authorities on what they are empowered, through national legislation, to demand.

- **Form a new national body from the existing national network of organisations**

In order to maximise impact, we recommend that the ‘model’ for this body is based on a collaborative national network of organisations working with local authorities and stakeholders.

- **Engage local authorities and their stakeholders in the next steps**

We support the commitment to provide the resources that will be required adapt and strengthen local planning systems but recommend that the next step is collaboration with local authorities on an implementation plan that describes the steps required to operationalise the new system.

- **Align the financial resources available to authorities with the scale of change**

We know that local authorities welcome the acknowledgement that additional resources will be required, but resources must align with the scale of change, not least the development of the capabilities and capacity task of developing numerous design codes in parallel and managing their implementation.

Our responses to specific questions

15. What do you think about the design of new development that has happened recently in your area?

There are developments that are ‘beautiful and/or well-designed’ and there are developments that are ‘ugly and/ or poorly-designed’ across our operating area of the wider south-east.

Clearly the government wants to address this variation and provide a framework through which the country builds **consistently** well-designed places.

We support this objective fully but think that the starting point must be to **ask what factors underpin well-designed places**. Our experience tells us that it is the result of best practice in five areas:

- Local authority corporate commitment to design/place quality;
- Local authority design leadership that sets expectations through policies, masterplans, guide and codes;
- A well-resourced internal design quality management system;
- Collaboration and knowledge exchange between the public and private sectors;
- Expert, independent, impartial design advice, guidance and training that reinforces the local authority commitment to design and helps to facilitate quality at each step of the process, working collaboratively with the authority as well as with applicants, stakeholders and communities.

If we want to build more well-designed places, we think the government should support the **scaling of this best practice so that it exists in every local authority**. This means that we think local planning

authorities are in the best position to deliver the objectives in the White Paper, but also that government needs to provide the legislative framework so that authorities understand they can unequivocally demand that developments are well designed. One of the objectives of the proposed reform must therefore be to provide clarity for local authorities on **what they are empowered, through national legislation, to demand**. For example, the current NPPF states that local planning authorities should have design review arrangements in place. Had the NPPF **mandated** design review for major applications, the results would have been transformational.

17. Do you agree with our proposals for improving the production and use of design guides and codes?

It depends on how design codes are developed, applied and managed, whether regionally, locally or site-specifically, and if they are used as part of a wider design quality management process. Design is an iterative process that must be responsive to both site context and brief, and codes will need to be carefully developed and tested on different proposals to ensure that the result is not the type of bland development that the government is trying to move away from.

There will also be a need for **design review of the codes**, to ensure that they are of the right quality and that subsequent design decisions are made within the parameters of the design codes. We are already working in this way with local authorities, providing **independent, impartial advice on policies, guidance and codes**.

There also needs to be ongoing review and governance of the codes over the entire lifespan of the development: Design codes, if made at the plan-making stage, will need to be **flexible and adaptable**. Many of the developments we are involved with are delivered over an extended period of 15 or 20 years. Over this time, codes may become obsolete and new thinking, new technologies, innovative practices, new cultural behaviours and new communities will have emerged. Time and sequencing are important factors to consider. Time-stamping design codes at the early stages has the potential to undo the intended democratisation if communities feel excluded from decisions further downstream which will impact the quality of their local places and the quality of their lives.

To deliver the results the government seeks, **codes will need to be integrated into an established, effective design management system**. We think the government should provide resources for local authorities to do this. Design South East, through a programme of workshops with officers from five councils and the private sector, facilitated the development of a shared design management system across a county in 6-months and will be happy to share how we did this. A key part of a design management system is a clear, compelling **spatial vision**. From our recent roundtables, we know that local authorities understand how important these are, but they simply lack time and resources to develop them. We suggest the government provides the support for local authorities to do this, not only because it will drive quality but also because without them there will be a lack of community and elected member 'buy in', resulting in delays to development. We would be happy to share our knowledge of organising and facilitating charettes with local authorities and stakeholders including the local community.

We support greater community engagement in planning, but there is a need to recognise the **step change in volume and depth** that will be needed to enable the delivery of 'provably locally-popular' design codes. Clearly there are also details that will need to be resolved, for example, why will communities engage in the development of a code for a site which they objected to the allocation of at the Local Plan stage? We know from our work that there is a real risk that what is 'locally popular' will depend on predetermined notions of what is beautiful (or otherwise), in terms of which familiarity and limited experience will narrow horizons of what is possible.

It will also take time to **'democratise' the design code template** given that many local authorities

will not have been involved in its development. We would be happy to share our experience of involving communities in the iterative process of design through workshops and charrettes.

18. Do you agree that we should establish a new body to support design coding and building better places, and that each authority should have a chief officer for design and place-making?

On the first question; we are sceptical about a national body that delivers ‘from the centre’, perhaps through ‘enablers’ or one that tries to deliver centrally developed programmes through local partners.

We support the option in the White Paper of architecture and design centres acting as the new national body. This model maximises impact by enabling **specific solutions to be developed by organisations already working collaboratively with local authorities**. The new ‘body’ is therefore a **national network of these organisations** through which best practice is shared.

This model already exists in the 9 ‘regions’ of England; it is the Design Network which includes several design and architecture centres.

The government may feel that this network is focussed on design review. However, members of the network, like Design South East, have **evolved the service** and already deliver a wide range of enabling and advisory services and training. Each organisation:

- Provides a **technical resource** for local authorities and their stakeholders, including communities. A resource that delivers enabling, facilitation, advice and guidance. A resource that brokers a design dialogue between stakeholders and that facilitates community engagement in the design process. A resource that builds the capacity of local authorities and their stakeholders, through training of officers and elected members.
- Manages an **expert panel** network, able to deliver the advice the government has recognised is essential, including achieving zero-carbon targets.
- Manages collaborative **working relationships** with a number of local authorities and their stakeholders.
- Is ideally placed to help to **share knowledge and best practice** across authorities and nationally.

We think the government should ask ‘what could be achieved by the existing Design Network if it was properly funded and tasked with delivering the work of the new national body?’

Regardless of how it is constituted, the new body should not focus exclusively on the planning process but should also promote and foster a **national design conversation** to change the national culture from one of **indifference to the built environment to a passion for it** and raise **demand for engagement** in its production. The government rightly references European planning models as exemplars for the new system but often these are based on public demand fostered through local architecture centres, for example ArkDes, Sweden’s national centre for architecture based in Stockholm. This is the time to work together to develop an equally strong structure in the UK, using the network of existing organisations and drawing on our collective experience of how to promote the value of design. In the past, programmes like How Places Work engaged young people through visits delivered by inspirational practitioners, and toolkits like Spaceshaper provided a framework for local people to assess the quality of local places.

The new body could also provide **design leadership** by disseminating best practice and advising on government funded capital programmes and projects, including infrastructure, education, health and housing.

On the second question of whether each authority should have a **chief officer for design and place-making**, our response is yes. However we know from our discussions that the priority for local authorities is internal and external design resources. A chief officer could play a pivotal role, but only if the role is entirely dedicated to design and is part of a fully resourced team.

19. Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England?

We fully support this and think that Homes England should play a critical role to play in delivering well designed places by:

- Giving greater weight to design quality by ensuring Homes England developments are guided by clear quality **standards** from the outset and that all stakeholders follow best practice **design management processes**, including the consistent use of independent design review panels throughout the pre-planning and planning processes
- Ensuring that all developments with Homes England involvement are exemplary and set a standard for the whole housebuilding sector to follow
- Capturing best practice deployed on Homes England developments and **share best practice** with the public and private sector planning and housing sectors

20. Do you agree with our proposals for implementing a fast-track for beauty?

No. Whilst we understand the wish to accelerate good development, we have significant reservations about a fast track approach, particularly if based on 'beauty'.

Instead, we recommend the government grasps this opportunity to use the planning system to develop a more **sustainable and healthy country** by promoting a wider understanding of the true meaning and value of design, recognising the pivotal role it plays in public health and wellbeing, in addressing climate change and helping people to live productively and sustainably.

This is the time to promote an understanding the value of well-designed places based on **how they work, not how they look**. In this the use of the word 'beauty' is not helpful because it is visual and subjective. Using it as a criterion for what constitutes a well-designed place could in fact result in communities **missing out on the social, economic and environmental benefits of good design** because basing 'provably locally popular' on what a place looks like will not help communities to live healthier, more sustainable and productive lives. Communities are rightly also concerned with issues like **infrastructure** (including social infrastructure) and will welcome the integration of these fundamental challenges into design solutions. Doing this will have a far greater impact than what homes look like - it will help **unlock the value of design**.

Our experience is that speed results from **collaboration between local authorities and stakeholders and a shared understanding of expectations at the outset**. We think a wider definition of design, beyond beauty, will help to increase and expand stakeholder engagement to include local planning authority teams and directorates beyond spatial planning and development management, such as housing, transport, health, climate change and education - and with other agencies and organisations.

About Design South East

Design South East started life 25 years ago as a resource for North Kent local authorities to help the public sector maximise the value of inward investment into the area. Small and agile, the organisation worked directly with local authorities, providing advice and guidance on briefs, procurement, masterplans and guides.

Demand for these services grew, and the organisation developed the Kent Design Guide and expanded its work throughout the county. Notable successes in this period include:

- Client design advice to a charity that led to the development of an outstanding piece of cultural heritage in The Smithery in Chatham Historic Dockyard
- Design advice that led to the award-winning Fishing Village on St. Mary's Isle, Medway
- The development of a 'tall buildings' strategy for Ashford Borough Council
- The development of the Ebbsfleet connectivity study that addressed connectivity to neighbouring communities

We are proactive, responsive and constructive and this means that we now provide advice and guidance across local authority departments and on a range of issues including design policies, guides and codes in addition to masterplans and planning applications.

Delivering this advice is made possible by the fact we have developed a knowledgeable and skilled staff team able to work with local authorities and manage the delivery of our services and that we have developed an expert panel network. Our panel is multidisciplinary and so can offer the range of support required under the new planning system. It is also responsive; panel members can be advising a local authority one day and delivering a training session the next.

Design South East plays a critical role in the quality of places across the wider south east, and will continue to evolve and adapt to meet the needs of our stakeholders and clients through four service areas:

- Independent, expert advice and guidance to local authorities and their stakeholders on development **projects** through design review and more informal advice;
- Expertise to support the development of the vision and principles for **places** and the design policies, guidance and masterplans, through workshops and charrettes;
- Working with local authorities to develop and/or strengthen their design management **processes**, to underpin the delivery of well design places;
- Strengthening the skills of the **people** in local authorities, and their ability to shape and manage design quality through the planning system.

As an organisation with 25 years' experience, we have a very established presence across the wider South East and have worked with over 40 local authorities in the last 12 months alone, giving us an unrivalled insight into how the planning and development sector works and how to bring diverse stakeholders together to achieve good design outcomes. The below examples demonstrate a fraction of our work:

Supporting Brighton and Hove City Council through design review, by providing expertise on the development of design policies, a CPD programmes and stakeholder & community engagement

As part of a wide-ranging partnership extended over several years, Design South East helped Brighton and Hove CC engage contending voices and multiple stakeholder groups in inclusive dialogue about solutions to the city's challenges through annual City Charrettes. These are intensive multiple-day workshops attended by stakeholders, members, developers, local practitioners and members of the community. Cross-sectional workshop groups work intensively to explore different themes, with findings captured in illustrated reports and feedback provided to attendees, who would then act as design champions within their communities and organisations.

“As our external DesignPLACE review service supplier since 2016, Design South East has been instrumental to our effort to improve the quality of design proposals in the city. Their independent advice has helped us to make sure effective design is included in local masterplans and major planning applications as well as helped to improve officer and member understanding of design issues.

Their bespoke consultancy which includes workshops and charrettes has helped us to explore specific planning challenges and regeneration issues. It has also helped to promote collaborative working across council teams and draw a range of stakeholders into the discussion to understand the value and importance of good design for those who live, work and visit the city.

To be able to tap into specialist design advice benefits our planning team and our customers. Going forward the review panel will play an important part in providing a high-quality planning service for the whole city.”

Paula Goncalves, Principal Planning Officer, Brighton & Hove City Council.

A Design Charter, shared design management system and programme of roundtables, study tours and events for local authorities across Suffolk

We worked for three years with all councils across Suffolk, the private sector and the public. Phase One was a series of training events, study tours and roundtables. Phase Two was an intense 6-month set of workshops and roundtables across the county. Participants co-created the Suffolk Design Management Process which sets out the process by which good design should be delivered through the planning system, and the Suffolk Design Charter, which describes the places Suffolk wants to make, both in terms of how they look and how they work.

The workshops involved assessing how different councils worked already, identifying where there were barriers, and then drawing up a new process from scratch, using the existing best practice and creating new solutions or actions where necessary, and ensuring community involvement from start to end.

We found that everyone involved wanted consistency, collaboration and communication throughout the process. They wanted clear outputs from different stages of the process, and the tools to be able to achieve them. Some of those tools were about replicating or amending existing best practice and some were about more significant organisational development (such as a change in culture, more training opportunities, and consistency across different councils). There was a strong desire for collaborative working through workshops to become the expected norm going forward.

Kent Design; a county wide programme of training, study tours and knowledge exchanges

Kent Design delivers CPD for public and private sector professionals at all stages of their careers through introductory masterclasses and webinars, knowledge exchange networking events, roundtables, conferences and study tours. It is a network for everyone involved in the built environment, providing a unique platform for collaboration.

To give one example, a two-day study tour of Bristol, Gloucestershire and Swindon was undertaken. Participants saw new developments and heard from their designers and planners, to understand how to create a sense of community and place. Participants studied the urban environment of Bristol's old docks through an ambitious mixed-use housing scheme, followed by a visit to a pioneering green development on the edge of the city, and visited two new rural communities that cater for the growing needs of family life and retirement.

"I thought it was very well organised and that it was a good range of development types. The speakers were particularly good and candid about the lessons learnt. I've already given a presentation to our planners. Lessons learnt from Tadpole Village were particularly helpful, as was the vernacular design references at Steepleton."

Participant Feedback

A range of facilitation, design review and workshops on the award winning Rochester Riverside

Design South East's advice and recommendations over more than a decade of involvement supported the development of a newly completed riverside neighbourhood that achieved 'Winner of Winners' and 'Building for a Healthy Life' Awards at the 2020 Housing Design Awards. The project saw previously inaccessible industrial riverside land reactivated for the whole community, with 1,400 homes plus squares, parks, a primary school, two hotels and local shops. After initially carrying out a competition for a link bridge in 2004, Design South East continued to work with the local authority and applicant team, including a design review in May 2014, and a design workshop in 2016.

They wanted to try and be in keeping with Rochester riverside, with what was here beforehand, they tried to incorporate that. I think it works quite well. It's a beautiful development, part of my life-line.'

Rochester Riverside resident commenting in June 2020

"The DSE Design Panel was an integral part of the design development which led to the successful planning approval and construction of a development which is rooted in its surroundings and which sensitively extends the heart of Rochester to include its wonderful river frontage."

Mark Bottomley, Partner, BPTW

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