Creating space for beauty

The Interim Report of the Building Better, Building Beautiful Commission

Response by Smart Growth UK

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Smart Growth UK

Smart Growth UK is an informal coalition of organisations and individuals who want to promote the Smart Growth approach to planning, transportation and communities. Smart Growth is an international movement dedicated to more sustainable approaches to these issues. In the UK it is based around a set of principles agreed by the organisations that support the Smart Growth UK coalition in 2013:-

- Urban areas work best when they are compact, with densities appropriate to local circumstances but generally significantly higher than low-density suburbia and avoiding high-rise. In addition to higher density, layouts are needed that prioritize walking, cycling and public transport so that they become the norm.
- We need to reduce our dependence on private motor vehicles by improving public transport, rail-based where possible, and concentrating development in urban areas.
- We should protect the countryside, farmland, natural beauty, open space, soil and biodiversity, avoiding urban sprawl and out-of-town development.
- We should protect and promote local distinctiveness and character and our heritage, respecting and making best use of historic buildings, street forms and settlement patterns.
- We should prioritize regeneration in urban areas and regions where it is needed, emphasising brownfield-first and promoting town centres with a healthy mix of facilities.
- Civic involvement and local economic activity improve the health of communities.

We are grateful to the Building Better, Building Beautiful Commission and to its Secretariat for this opportunity to comment on its *Interim Report*.

Overview

The Commission has produced a long and complex *Report*, unusually so for an interim document. Interim reports usually restrict themselves to indicating a direction of travel and seeking further views on areas where findings are yet to be determined. It's interesting to compare it with the recent interim report of the Landscapes Review which occupies just five pages. While this tells us frustratingly little, your Commission's very long report does become impenetrable at times. But it raises many important issues and deserves an equally complex response.

Recommendations

We strongly recommend that the Commission accepts that opposition to garden communities and other new settlements cannot be reduced, as such developments are, for the most part, inherently unsustainable.

We support the Commission's ideas on "mixed-use gentle density" but this would need careful definition. It would vary from place to place and would have to be specified in local plans. It is unclear, however, why this should just apply in "centres" as we believe it important to end wastefully low densities in all developments, except for a few sensitive locations.

We believe that preservation of historic buildings and townscape and of the countryside are fundamental issues in securing beauty in our environment.

We believe the Commission should say the problem is too little planning, not too much.

We recommend the re-establishment of regional spatial planning in England as part of a tiered policy approach of national, regional, sub-regional and local plans.

We believe there should be an urgent review of national planning policy along Smart Growth lines, restoring brownfield-first and density standards, with a new system of allocating housing land based on actual need.

English local planning authorities must be given the tools and resources they need to do the job.

We believe that beauty in new building development is not something that can be guaranteed and it will always need the test of time to become clear whether it has been achieved. Nonetheless, there are things that can be specified that substantially increase the likelihood of developments one day being judged beautiful.

We believe that there are a huge range of entirely rational sustainability concerns involved in objections to new development.

We recommend that the Commission's final report examines what role traditional building design could play in creating beautiful urban spaces.

The Commission's overall remit was "Building Better, Building Beautiful". As these raise a number of separate (though inter-related) issues, we will deal with them in that order.

Building Better

"Creating Space for Beauty" – The Land Issue

Many issues are opened up by the Commission's remit to secure better building as well as beautiful building.

In a very densely populated country like England, there is always going to be intense competition for land. At present, some parts of the country suffer from a shortage of housing, other parts from a shortage of jobs, the whole country suffers from lack of sufficient agricultural land to meet its food needs, whole regions of the country are chronically short of water and large parts of the country have beautiful landscapes, only some of which are protected, and many of which are under pressure from development. Of course people fight to protect their environment – which at heart means the land.

Housing shortages apart, all this is ignored by the Terms of Reference the Commission was given whose stated purpose is reducing opposition to house building by improving design standards. Improving design standards is a very laudable aim, as is providing the houses the country actually needs (as opposed to meeting some abstract assessment of demand). We understand that the Commission is circumscribed by the Terms of Reference, but equally it needs to be said that we are not. We believe there are other ways of addressing the issues the Commission was charged with reporting on without slavish adherence to policies which would guarantee unsustainable development.

The *Interim Report* addresses the issue of sustainable development in Section 6.3 where it rightly notes that: "settlement patterns and transport choices have a measurably important impact on our energy usage. Put simply, those living in denser settlements tend to use much less energy getting around. They can use feet, bicycles, trains and trams. Those living in extended suburbs or the countryside tend to be far more reliant on cars. Those living in suburbs support[ed] by local rail are 'in the middle' in terms of energy usage." The *Report* rightly concludes (6.8): "there is rapidly growing awareness of the urgent need to evolve the emphasis from house-building to place-making and to develop more sustainable settlement patterns". Place-making is vital, but more sustainable settlement patterns will involve much more than simply better design, community involvement and appropriate densities.

A key part of this will be where we build. There is an ambiguity in saying (page 69): "The aim of future planning and development should be place making, remodelling existing settlements and delivering enough good, beautiful, sustainable settlements in the right places". Certainly place-making should be central to all planning and some settlements do indeed need some remodelling. But what, in this context, are the "right places"?

Section 11 is supposed to address the issue of beautiful buildings, beautiful places and beauty in the right place. The Commission rightly questions whether Government is doing enough: "to produce beautiful places, streets and buildings". And we would agree that local planning authorities feel under-supported when they try to obey the *NPPF* instruction to turn down badly designed or ugly buildings. The *Interim Report* addresses the beautiful buildings issue and we would agree with much of what it says. It also addresses the place-making issue. But where is the issue of the right place addressed?

The answer, it would appear, is Policy Proposition 15. There is, however, already a significant degree of collaborative working between local authorities and LEPs over place-making; sadly the results are all too often negative ones. A fine example is the so-called "Oxford-Cambridge Arc" (and the partly contiguous "England's Economic Heartland") which plans a million greenfield sprawl homes on prime agricultural land served by a new £3.5bn motorway from Newbury to Cambridge[1]. This is not the creation of beauty, it is car-dependent sprawl at its very worst. Collaboration between authorities on its own will not work. We need to collaborate more generally towards sustainable outcomes.

The *Interim Report* addresses how we build, and we would support much of what it says. But an equally key question, addressed but little, is where we build.

The *Report* says (12.2) that we must work to "protect the inherent beauty of the urban and rural areas". Indeed we must. Most people would agree that most areas of countryside have inherent beauty, for the reasons the *Report* explores. Most would also agree the same could be said about some urban areas. But beauty is harder in the urban context; what is commonly agreed to be beautiful generally only becomes apparent over a long timescale (see below).

So a large majority of greenfield developments will almost inevitably result in a reduction in beauty. Plainly such a conclusion would be at odds with the Commission's remit to find ways of reducing opposition to new greenfield garden communities (and, by extension, to other major greenfield sprawl). But while such a conclusion might be impolitic; it is inescapable.

The *Interim Report* almost addresses this issue in Policy Proposition 13 which proposes redevelopment of large retail spaces into mixed use developments. In principle we would support this. Some of the least sustainable shopping centres are the out-of-town ones, which mostly necessitate long car journeys from their customers. While, plainly, sustainability would be served if they were to close, it's not obvious they could sustainably

be redeveloped. Few have rail-based public transport nearby and while its provision would be desirable, it's not likely to happen on the back of a few hundred houses. So Policy Proposition 13 should surely include a proviso about rebuilding such retail space where it is sustainably located. Where it is not, presumably a green end use would be preferable.

There is a serious "elephant in the room" in the *Report*, doubtless a result of the Commission's Terms of Reference. This is the references to "establishing garden cities/towns/villages" and "planning and design of new settlements". In a desperately crowded country like England, it is very seldom possible to find the space for these without a major onslaught on rural beauty and on sustainability. A couple of the former "eco town" proposals were put forward at relatively sustainable locations on brownfield sites in cities, but neither made the shortlist. The same is true of the garden communities programme. Arguably Ebbsfleet could meet such criteria, but none of the others could (neither those approved by the Government or the flood of self-styled "garden villages") all being largely or wholly greenfield, at remote locations and few, if any, near the multi-destination, rail-based public transport networks needed were a Smart Growth approach being followed.

There are inherent challenges to sustainability in the "garden city" type approach locked into the garden communities programme. Sir Ebenezer Howard insisted they be greenfield developments separated from existing urban areas and this is the approach followed by many of the present crop, although some are urban extensions. Even these insist they are separate developments. Another key challenge is ultra-low-density, which squanders land. Some argue that Howard did not seek very low residential densities; this may be true but he also sought vast areas of largely pointless landscaping in his developments which dragged densities down. And, in any case, the garden city movement's standards on density (supported to this day) were set by Sir Raymond Unwin who stipulated a maximum net density of "12 to the acre" (about 30dph) and plenty of garden cities and new towns were built at even more disastrously low densities.

Builders to this day generally find it more profitable to build at ultra-low densities on greenfield sites, thus ensuring land gets squandered on the grand scale in such developments. This will be at its most acute in garden communities, where a whole range of new infrastructure must be created along with the houses.

We understand the Commission's dilemma here. The Terms of Reference require the Commission to specify ways of reducing opposition to garden communities and other new settlements. But the proposed garden communities will achieve neither better building nor beauty, and opposition is growing. It is, however, within the locus of any commissioned body to report that what is demanded in its Terms of Reference cannot be achieved.

We strongly recommend that the Commission accepts that opposition to garden communities and other new settlements cannot be reduced as such developments are, for the most part, inherently unsustainable.

Density

The Commission rightly give a great deal of attention to building densities and we support much of what the *Interim Report* says.

"Gentle density" appears to be close to what we've called, with deliberate imprecision, "appropriate densities". But the 3rd paragraph of page 15 rather creates a melange of issues – density, permeability, proximity to a centre, regeneration and suggests that "gentle density" is for creating new types of settlement. Why not apply appropriate densities (which should vary and be set out in some detail in local plans) to all development (with a few exceptions in very sensitive landscapes)? If applied in existing settlements, it's not "creating the type of settlement", it's adapting them. This might sound like a linguistic quibble, but it's fundamental to a lot of the objections to the massive developments people are having foisted upon them.

Policy Proposition 16 advocates: "Mixed-use and gentle density settlement patterns around real centres". The *Interim Report* defines "real centres" (page 43) as centres where people: "can access the services they need, are walkable, are not overwhelmed by traffic, are places in which they can form real bonds with neighbours, are somewhere not anywhere, are restful when necessary but can also stimulate when required and in which they can influence their environment not merely be passive recipients of what they are given by the man in City Hall or Big Developer plc".

It is central to the Smart Growth approach that any sustainable development should be walkable (and cyclable), not overwhelmed by traffic, socially adaptable, with mixtures of uses and with community support. They should also be served by high-quality public transport, rail-based where possible, be within easy reach of shops, healthcare and education facilities, respect biodiversity and heritage and should not squander land unnecessarily.

What we don't understand is why such qualities should be limited to developments in "real centres" or indeed centres of any kind. Surely these qualities are inherent in sustainability of virtually all urban development, especially where people live? Traditional towns and villages did not have diminishing densities the further one got from their centre; they were generally fairly uniform (apart from the farmyards and farm buildings around traditional villages). What blurred that has been the 20th (and 21st) century garden suburbs, but their development pattern and density, pretty much the paradigm since 1919, can hardly be claimed to be a model of sustainable densities. There is no reason why sustainable urban densities shouldn't be applied to all urban developments, apart from a very few sensitive rural or historic areas.

The Commission is, of course, right to say (page 37) that densification is opposed by many. One reason is that most of it recently has taken place in inner cities which are already densely developed and, while Smart Growth promotes densification, some US practitioners

have run into criticism for pushing that too far. The real challenge is densifying our low density garden suburbs, about which few people seem to be talking. How do you do that and keep them beautiful (or make them beautiful anyway)? We share the Commission's interest in the evidence of Ben Derbyshire (pages 76-77) of: "development from two storey suburban housing, to medium-density terraced developments, plot by plot, on a pre-approved code". There is no reason at all why that shouldn't become commonplace for new developments and there would be clear advantages in using it as a method to densify existing very low density areas. The Commission's thoughts on how to do this in spite of the inevitable (and understandable) opposition would be welcome.

We support the Commission's ideas on "mixed-use gentle density" but this would need careful definition. It would vary from place to place and would have to be specified in local plans. It is unclear, however, why this should just apply in "centres" as we believe it important to end wastefully low densities in all developments, except for a few sensitive locations.

Planning and Preservation

We were sorry to read the Commission's belief (page 53) about "the 19th century garden city movement and its important attempt to plan a way out of the coal-encrusted filth of Victorian cities". The garden city movement was an essentially 20th century phenomenon (it wasn't founded until 1897). By the time it was formed, 19th century squalor had been under vigorous attack for decades by social reformers and that included the design of the built environment. What the garden city movement attacked was not the slums, but the functional, permeable, walkable, tramable, socially-cohesive, byelaw home communities of the late 19th and Edwardian eras (specifically attacking them in the 1909 Planning Act and the Tudor Walters Committee at the end of the Great War etc.). The late-Victorian and Edwardian "gentle density" suburbs stand as examples of sustainable urban development which has never been bettered in this country and which were capable of creating great beauty. The garden city movement attacked this and gave us 100 years of low-density, car-dependent suburbia.

Smart Growth practitioners would certainly support creation of permeable townscape that is navigable on foot or on a bike and which is pretty well always within 800m of high-quality public transport networks, rail-based where possible (10.1). We also strongly support Historic England's evidence (10.2) that protecting the historic environment yields environmental and economic benefits as well as improvements to well-being. There is ample evidence of this – was it ever in question?

The *Interim Report* makes the point that conservation area houses enjoy a price premium (page 50). We'd just like to point out this is certainly true in the more prosperous parts of England. Against that, there no less than 502 conservation areas on Historic England's *At-Risk Register*[2], many in the north of England.

Historic England has over 500 conservation areas on its At Risk Register

We also support harmonization of tax regimes for repair and new build.

As to whether it is possible to build beautifully, we would repeat what we said earlier (page 54), that it may indeed be possible to build beautiful buildings today, but only those which withstand the judgement of time will qualify as such. Too many will simply be judged beautiful by those with vested interest. All we can do is set standards and advice which are likely to produce beautiful buildings. As to whether local planning authorities lack the powers to refuse poor design applications, it's worth pointing out that it's not lack of advice about design in the *NPPF*, it's that much greater weight is given to factors like building raw numbers of houses which trumps good design.

We believe that preservation of historic buildings and townscape and of the countryside are fundamental issues in securing beauty in our environment.

Planning – Powers and Weaknesses

The *Interim Report* says (page 55) that: "Some believe the problem is too much planning. Some believe that it is too little. We have to understand the dynamic of different perspectives, and to get beyond them where we can." This is an irreconcilable debate; the

Commission evidently accepts that planning is a good thing but powerful forces, including within government, believe that it isn't. We strongly believe that it is, however, and that only by a strong and well-resourced planning system will we ever achieve the sort of standards the Commission is seeking. At the moment England's planning system is neither strong nor well-resourced. A Whitehall process, driven by the Treasury, has spent years trying to undermine it in the erroneous belief that planning harms the economy. Often one gets the impression that many in central government would like to abolish planning entirely, but are held back by public opinion alone.

Nowhere is this more acutely felt than in the big push, accelerating for almost 20 years now, to build raw numbers of houses, whether of the type that are needed or not, or whether in the locations where they're needed or not (pages 56-7). The problems of planning for housing in the *NPPF* go a lot further than five-year supplies. The whole process has effectively been handed over to developers and their consultants by the whole system of "call for sites", SHLAs, SHMAs, OAN, 5-year supplies, viability, deliverability, delivery tests, large sites, "garden communities" (all hopelessly subjective and biased) etc. and the absence of brownfield-first. Aesthetic control is the weakest tool in the pack, although the whole toolkit has been weakened to breaking point.

It's not just the public that feels excluded from plan-making (page 73). Many council planning officers are feeling badly bruised by the whole process. One problem seems to be the enforced "politicisation" of the Planning Inspectorate which has happened since 2012. Once highly respected, quite a lot (though not all) of inspectors entrusted with examination-in-public seem to believe they need to enforce the *NPPF* very literally, however destructive the end result. A few don't, but it's eroded respect for PINS which is very, very sad. What we need is a new approach to ensuring plans conform to national policy – and new national policy.

Collaborative engagement is not wholly defunct (page 58), but it's rare.

It's unclear why it's considered the risks of planning are "growing" (10.9). It has always been the case that hoped-for uplifts wouldn't be obtained when planning consent is refused. The problem is that permission is now so easy to obtain in cases where it shouldn't be, that developers are prepared to wager much of the uplift in the expectation consent will be granted, accepting that they will, in rare cases, lose.

Plan-led development can work very well (pages 59-60), unless the local plan process has been handed lock stock and barrel to the developers. Planners themselves are extremely resistant to the notion of themselves as regulators and believe themselves to be place makers. Place making is admirable, but much of the day-to-day graft of development control is, and should be, regulatory in nature. There's nothing wrong with that; well-regulated countries are well-run countries.

English local plans may well be very weak (and often get further undermined in the examination process) but they have also become long, impenetrable and cumbersome. We would support moves to a more discursive system and note (page 61) that the US is moving sharply away from destructive single-family zoning (under pressure from the Smart Growth movement). Form-based codes may well offer an element of a beneficial route forward.

Sadly (page 62), under-resourcing has all too often turned the pre-application process into a way of extracting money from applicants in return for nothing very useful.

The *Interim Report* doesn't mention density standards in the discussion of form-based codes (page 62). They are presently hard to insist on, of course, because they aren't backed by national policy (like so much else).

Office-residential permitted development (page 63) isn't just producing the slums of tomorrow, it's producing slums of today. Home extensions, especially upwards are also degrading the environment in many not-quite-conservation areas. Perhaps if they were restricted to areas of lower housing density?

We certainly do need to tax betterment (page 65), but central government has tried five times since the 1940s and failed thanks to the power that vested interests wield in both Westminster and Whitehall. The whole process of securing land for building will never work until we do.

Under highway design (page 66), the Commission could usefully point out that a majority of English LPAs are still using the dreadful and long superseded Design Bulletin 32 and not the much better Manual for Streets. The "suburban" character which results is extremely damaging to the character and beauty, of villages especially.

We believe the Commission should say the problem is too little planning, not too much.

Planning – at the National, Regional, Sub-Regional and Local Levels

The *Interim Report* wonders whether (page 68): "… with the systemic backlog of housing supply and sky-high residential value, residential uses will trump all value in regions such as the South East right now. How do we manage this whilst permitting evolution, flexibility and change?"

The swift answer is a simple one: regional economic and planning policy.

As the Commission rightly says about house building: "too many are not good enough, are not in the right places and are not in proper settlements." So how do we address this?

Unfortunately it requires more than merely an ambition for “creating space for beauty” (Section 11). When judged against the Commission’s Terms of Reference, what does that mean essentially? Presumably just releasing greenfield land for “beautiful” development.

Policy propositions 15 and 16 are unfortunately very weak. Where is regional and national spatial policy? Putting it very, very crudely, the north of England is short of jobs while the south is short of housing. Yet we continue to push employment growth in the south and housing growth in the north. Successive governments tried post-war with limited success to redress this balance. Over recent years the attempt has been largely abandoned save for weak and often ineffective “initiatives”.

One of the few things that did allow some of our ever deepening and destructive regional inequalities to be addressed was regional planning. This was finally abandoned in 2012, fatally undermining ongoing attempts to redress the balance. Recently there has been a limited revival of sub-regional planning through city deals etc., but this is not enough.

Another aspect of “building better” which surely the Commission needs to address is the issue of the ecosystem services the land built on provides. This is not just its contribution to water, food and timber supplies and flood control we mentioned earlier, there is also the whole question of providing water for sprawl development in the south and east of England. The current drought has cruelly demonstrated the inability of our water resources to provide for even existing levels of development, let alone millions of new homes, as rivers in the south and east of England run dry.

To have any chance of securing the objectives of the Commission, we urgently need robust national, regional, sub-regional and local spatial planning. And these must be backed by equally robust economic policies which no longer accept that only “winners” are worth backing, like the Oxford-Cambridge Arc proposals. Economic development needs to be directed and supported to regions of the country which actually need it, which have people needing jobs, no acute housing shortage, adequate brownfield land and a need for regeneration, as well as the qualities which prompted the Arc proposals. This is something we shall be reporting on shortly.

Coupled with this must be an urgent overhaul of national planning policy, restoring brownfield-first (for housing and employment) and robust housing density standards.

Finally, the desperate under-resourcing of English local planning authorities must end. Give them the tools and they’ll do the job.

We recommend the re-establishment of regional spatial planning in England as part of a tiered policy approach of national, regional, sub-regional and local plans.

We believe there should be an urgent review of national planning policy along Smart Growth lines, restoring brownfield-first and density standards, with a new system of allocating housing land based on actual need.

English local planning authorities must be given the tools and resources they need to do the job.

Building Beautiful

Beauty

We agree that beauty matters but, hamstrung by its Terms of Reference, the Commission faces an impossible challenge, which page 10 of the *Interim Report* hints at: "…people are confident and capable in talking about what beauty means to them when discussing historic places; the countryside; the beauty of nature… However, they are less confident when discussing the contemporary built environment." Less confident? Or simply less likely to be in agreement? Or is it something even simpler – that, for any practical purpose, beauty in the built environment is a quality that needs the test of time to be accepted?

Page 11 rightly accepts that beauty is a subjective issue and the treatment of the subject reflects the fact that the Commission has been chaired by both a philosopher and an urbanist, which is actually to the Commission's advantage.

Perhaps ugliness is easier to define than beauty; certainly people are quicker to decry it than they are to commend beauty. We are unconvinced by the argument that beauty is not "subjective" (page 14). The *Interim Report* says: "Beauty may be in the eye of the beholder, but the beholder is a complex social being who lives by dialogue, conciliation and attachment. Beauty is in the eye of such a beholder only in the way that love is, and like love the judgment of beauty is grounded in an apprehension of its object and a relation of dependence, the violation of which leads to unhappiness and alienation". It is very hard to see what such abstruse academic conceptual thinking can add to the practical problem of deciding what is beautiful and what is not.

The final paragraph on page 14 conflates the issue of building a building that is "better" than its predecessor, with it being more "beautiful". Certainly most people would accept that replacing a chaotic derelict site with a well-designed and attractive building has reduced the ugliness of the site - and possibly that it is more beautiful. Certainly too there may be an environmental net gain, but the issue of whether it's more beautiful is not complementary to that. It's fundamentally different, even if we accept the premise that the planning system is more geared to preventing harm than supporting net gain. And, let it be said, there is nothing wrong with ensuring no net harm.

The lengthy discussion of the nature of beauty in Section 5.2 adds very little to this beyond saying it's important and we should protect and promote it.

We can certainly agree strongly that: "What people want, what will best deliver for people and beauty, therefore, is buildings that reflect the history, character and identity of their surroundings: somewhere, not anywhere" (page 19). But there is a clear tension in this section about what kinds of beauty we're talking about. The *Interim Report* says: "No more should we tolerate ugly buildings, ugly neighbourhoods, settlement patterns that are bad for us or our environment or places from which the residents wish to flee. Nor should we allow our countryside to be spoiled by unsightly developments or our historic cities to be mutilated by structures that tear their fabric apart" and that: "At the same time, we should distinguish natural beauty, artistic beauty and everyday beauty".

This reflects an issue to which we shall return, namely natural beauty. It's a most important issue and crops up all over the *Interim Report*, yet it's plainly outside the Commission's Terms of Reference (quite wrongly in our view). This remit requires the Commission to say how to reduce opposition to garden settlements, yet almost without exception these involve destroying tracts of countryside which may well be beautiful and replacing them with mundane suburbia. The huge quantities of imaginative PR which putative garden communities emit (in which "beauty" looms large) are not going to change that.

And there's another fundamental question here, which undermines the whole thrust of the Commission's remit from central government. A key element in the beauty of the built environment is the test of time.

Architects of course love their creations and believe them to be beautiful. Developers (and their shareholders) may see a beautiful profit, but that's certainly not what is meant. Sometimes, informed critics judge a new building beautiful and they may even be joined by some of the public. But all too often such approval doesn't last; not infrequently it doesn't last very long at all. One person's iconic building is another's eyesore. The annual "Carbuncle Cup" is testament to this.

Despite this, the *Interim Report* claims (page 35): "We need to move from the assumption that beauty is a property of old buildings that is threatened by new ones, to the assumption that beauty is a controlling aim in all that we do." Surely it's impossible to guarantee, or even make very likely, the judgment that a new building or wider development will be judged beautiful by future generations. All we can do is do our best to make sure they harmonize in terms of scale, material, use, detail etc. with other local buildings that have stood the test of time. That is far more likely to generate long-term judgements of beauty than architects flaunting their egos.

Our judgements about beauty (the ones that are widely shared anyway, which seems to be an element in the Commission's thinking) are normally based on the test of time. There are very good reasons why we wait decades before declaring listing or conservation areas.

All too often some commentators hail some new in-your-face building as “beautiful”, only for it sooner or later to go out of fashion and be judged an eyesore. Architects are the worst at this – hailing each other’s excrescences as masterpieces and handing out gold medals or whatever.

The buildings of the 1960s were often powerful examples. There was a strong culture of approval for the in-your-face buildings of the time (even the Brutalist eyesores) which were held to be “bold statements”, “breaks with the stultifying past” or which “rejected bourgeois values” (though happy enough to make money).

Some judged Gateshead’s “Get Carter” Car Park beautiful when it was built

In time many of them came to be seen as some of the most discordant, ugly and dysfunctional buildings ever produced. Judgements that they were beautiful didn’t last, outside the architectural profession anyway.

True beauty in the built environment is like a tree; it takes time to develop. We can, and should, certainly plan our buildings so that they do indeed “get things right” and “fit in” (page 18). That (and other considerations) does give them a good chance of one day being widely judged beautiful, which is what we seek.

All we can really do with new developments is meet the conditions which are likely to result in future judgements of beauty. Contemporary judgements about new buildings are quite likely to be wrong.

In summary, therefore, beauty in the built environment is not something we can reliably judge at or near the time of construction (though ugliness is much easier to spot). To be judged beautiful, there must be widespread acceptance of its beauty after a significant period of time. All we can do to secure it in new development is to seek harmonious development - under a series of tests.

We believe that beauty in new building development is not something that can be guaranteed and it will always need the test of time to become clear whether it has been achieved. Nonetheless, there are things that can be specified that substantially increase the likelihood of developments one day being judged beautiful.

Beauty and the Planning System

Beauty of course already is an objective of planning (page 19). We have Areas of Outstanding Natural Beauty etc.. It even gets nine mentions in the *NPPF* (and not only about AONBs).

The *Interim Report* says (page 35): "The aim of easing the planning process, and the aim of conserving beauty, should be complementary parts of a single endeavour". Of course they ought to be, but they very seldom are.

"Proposals need to be made in a spirit of profound sympathy for their task, and a desire to support them in working towards the outcome that the country needs." Indeed they do, but very seldom does this happen.

Making it happen requires a planning system that is adequately resourced and with the power to say no. The Commission should be recommending much stronger powers for the planning system without all the dilution of the past 35 years, and the past 15 years especially.

The Government (and the Treasury in particular) will resist this, but we strongly believe this ought to be the Commission's central message. Without it, the rest won't succeed. Developers have always done what's most profitable and always will; there's nothing wrong with that, it's central to how our economy works. But all too often when the industry is left to its own devices, the result is a failure of the market to deliver things we want and need, including beauty.

Countering this would require robust reconsideration of the bizarre but long-standing belief that a tightly regulated economy is a less prosperous economy. In fact chaotic economies (like ours) don't perform well. Planners may balk at the suggestion that their discipline is a regulatory system, apparently believing this would be at odds with the laudable aim of place making, but in reality there is no such conflict.

It is maybe unwise to use controversial and recondite academic terms like “gestalt” (page 19). Individual elements of a scene can be beautiful while surrounded by ugliness. A view of a hideous commercial or industrial installation might, for instance, allow distant views of hills. But such a scene could scarcely be construed as beautiful.

But it does raise the issue of visual continuity. A tract of countryside, say, might be widely considered beautiful by many people. Suppose, then, a volume house builder comes along and covers half of the scene with houses. Does it become half as beautiful? No. Most people would probably say it isn’t beautiful at all any longer (though the builder’s shareholders would probably disagree).

Equally a fine Georgian terrace might be widely judged to be beautiful. But had some 1960s developer demolished a couple of its houses and built a concrete and glass box in the middle of the terrace (it did happen), few would still say it is beautiful; at best a case of marred beauty perhaps.

From the 1970s onwards, many architects found ways of harmonising new development with existing by paying attention to qualities the *Interim Report* cites including scale, materials, detail etc.. This may be dismissed by some as “pastiche”, but that’s a poor argument. Bad pastiche is certainly to be avoided, but respect for surrounding development is a key element of protecting beauty. Who knows? Sometimes even a respectful new development may itself, in the fullness of time come to be judged beautiful.

The same applies to the beauty of the countryside, even though this is explicitly outside the Commission’s remit. A key element in the designation of national parks and AONBs is that they contain, essentially, unbroken tracts of fine countryside. They may well also include individual buildings, villages or even towns. But the defining feature, the thing that gets them judged beautiful, is unbroken countryside free, or virtually free of development (especially development that hasn’t stood the test of time). There is no reason why the same criterion shouldn’t apply to the rest of the countryside outside protected areas. There may be areas which are considered beautiful which contain a mix of development and countryside, an historic village in a wider landscape perhaps. But judgements of beauty in a rural scheme will always be less likely to be made when development is present. And beauty in the built environment normally involves an element of tidiness. Natural beauty is different; given the threat to the countryside, habitats and wildlife from climate change and development, it is important to encourage a broadening of the idea and appreciation of beauty to include the “untidy”. The countryside does not have to be neat or manicured to be beautiful. The “untidy” side of nature is actually no less beautiful, often more so, and it certainly tends to be more richly biodiverse.

The Commission’s Terms of Reference require it to achieve “greater community consent”. That’s a laudable objective; all too often communities feel excluded from the process, watching helplessly as their local planning authority is forced – or sometimes bribed by a

slight loosening of the central government purse strings – into approving developments which are both unsustainable and visually offensive. We are unconvinced by the suggestion on page 36 that there are places where developers "don't go and work". Where are these local planning authorities who have managed to withstand the whole armoury of "calls for sites", SHLAS, SHMAs. "objectively assessed need", "five-year supplies", viability, deliverability etc.?

The *Interim Report* claims that: "For every new development that is denied planning permission, there are many more that were never made in the first place, written off as simply being too difficult". "Too difficult" in this context will simply mean that none of the armoury of weapons available to housing developers would work, suggesting the site in question is quite intensely unsuitable and unsustainable. Yet plenty of unsuitable and unsustainable (even in very straightforward planning terms) sites get developed. If the Commission believes community opposition has the power to turn back developments in any but a handful of cases, it has been misinformed. The *Report* says: "It is extremely time consuming, often thankless and sometimes extremely expensive to resist development". This is true, but the Commission needs to understand that it is very seldom successful. Developers know very well how to work the system and seldom waste the large sums of money at their disposal on no-hope developments.

Sad to say, the *Interim Report* paragraph 8.1 is potentially patronising if it means the Commission believes simple inherent conservatism makes people oppose developments. There is nothing whatsoever wrong in people's preference for the familiar and the contrast drawn between emotion and memory and rational thought is a false one. These are all aspects of well-being, a concept that would be well worth more consideration in the Commission's findings.

In this context the *Interim Report* says (page 47): "they devote their energies instead to stopping development, whatever form it might take". This is acutely unfair. Thousands of well-informed members of the public give up their spare time, with much trouble and expense and no reward, to engage in the planning process. All too often they find their well-honed arguments, even in full conformity with national policy, are dismissed because the system has been set up to fail them and to secure development at any cost.

Love of nature (page 36) may well be one reason why people advocate building on brownfield sites before greenfield, but it is extremely unfair to advocates of brownfield-first to even suggest this is all there is to it. Brownfield-first has a wide range of advantages which include:-

- The presence of derelict land in urban areas can affect local people's health and deters investment in regeneration.
- Derelict sites may be contaminated, causing contamination off-site and act as sources of invasive alien plant species like Japanese knotweed.
- Derelict sites encourage anti-social behaviour and vandalism.
- Brownfield sites are likely to be better sited from the point of view of public transport and access to services.

- Brownfield sites are likely to have been covered by hard surfaces so there is little increase in "soil sealing" when they are developed; greenfield sites will be wholly unsealed, so development increases sealing;
- Despite exaggerated claims about brownfield wildlife, overall, greenfield sites are likely to be much more important from the biodiversity point of view.
- Generally brownfield sites have low ecological value; the overwhelming majority of SSSIs are greenfield
- Brownfield sites are fragmented while greenfield are generally linked in continuous networks of countryside and biodiversity.
- Greenfield development damages all the ecosystem services they provide: production of food, water and timber, flood control, support for biodiversity, outdoor leisure, the psychological benefits of access to countryside and nature etc.; brownfield offers few of these.

Protection of greenfield sites goes far beyond love of nature. It's a pity the Commission's Terms of Reference don't include an examination of beauty in the natural, or at least countryside, environment because a point the *Interim Report* doesn't really address is that "love of our countryside" is buried very deeply in the national psyche. You could hear it in the language of those forced into the cities by poverty in the 19th century and those who desired to escape it to some kind of rural idyll in the 20th. Wartime propagandists made great use of the countryside in their "this is what you're fighting for" messages. People feel almost physical pain when a local tract of countryside is covered by houses, even one of those arable prairies the wildlife sector spends so much time decrying, yet which still provide many ecosystem services.

As the *Interim Report* says (page 37): "this intuitive desire to protect greenery at all scales is very rational in terms of personal well-being and happiness, to say nothing about the wider discussion on sustainable land use patterns". We believe this is a fundamental aspect of well-being which should be addressed. People widely believe that erosion of the countryside is a process by which beauty is replaced by ugliness. People feel a release when they enter the countryside, even farmed landscapes, from built up areas. A great deal of work is being done on this now and the National Trust is pushing it hard.

In this context, while you make a number of references to the importance of landscape and although you say (9.9) that climate change: "has very profound implications for how we deliver our third scale of beauty: development beautifully placed in sustainable patterns sitting in the landscape", you seem unwilling to say how that might be achieved. Landscapes, beautiful ones especially and beautiful natural ones even more especially, are very delicate things. They are very easily trashed and few things trash them more easily than major housing developments, whatever the "green wash" involved. Once again the test of time is needed to judge built landscapes beautiful.

In any case, the opposition to major developments such as garden communities goes far deeper than conventional beauty, however defined. The "beauty" conveyed by developers and

planners via “consultations” can be a misleading mirage of aspiration and imagination. In the case of Bailrigg Garden Village, Lancaster, for instance, “consultation” events held last year included beautiful photos of the proposed site as it is now, with the irony that those spectacular views would be built upon. The same is often the case with developer concept masterplans which create a “mirage” of beauty hiding a morass of unsustainability. An example is provided by a recent scoping bid by Gladman’s for 750 houses in south Lancaster. The accompanying brochure and blurb was all about the family values and experience of the company and the beauty of the development proposed. What it hid was a transport proposal that included cars from the 750 houses exiting on to an exceptionally steep hill, with options to an overcrowded A6 junction or on to a minor road where there are 2 primary schools.

Many communities are engaged in opposing garden communities and, from their experiences, we do not believe they could ever be made popular. Instead of the honest, frank discussions with communities, with adequate responses to points raised, they are simply being imposed despite the fact that many are plainly undeliverable, badly located, face intense local opposition and their financial foundations are shaky. As one community leader told us: “Who wants 24,000 architecturally pleasing homes in the wrong place, generating traffic and air pollution and destroying the natural environment?”

Nor are we convinced that opposition to greenfield development has much to do with concerns about house prices; there is little evidence (even though people do, actually, have a right to be concerned about such things). Such opposition goes well beyond owner-occupiers and undoubtedly: “it is not just about home ownership and value”. Indeed, it may have little or nothing to do with them. The points the *Interim Report* makes in the last paragraph of page 39 are valid ones. It has nothing to do with uncertainty and risk (page 38); usually it is all too certain what the effects of a development and the risks involved will be.

Opposition does, however, come partly as a result of the erosion of trust among local communities in the planning system, especially since 2012. A history of distrust and erosion of genuinely local input goes back further. The sense of powerlessness and frustration this brings distorts the whole process. Local communities feel side-lined, disregarded, demonised as “NIMBYs” even when faced with a travelling roadshow of developers, QCs and consultants who have no interest or working knowledge of their communities and cannot even pronounce the names of villages correctly. Not infrequently the professional people supporting the development show a level of patronizing contempt for residents, which is most unlikely to secure local support.

Concerns about harm to economic, practical and emotional interests (Section 8.3) are indeed reasons why people oppose new developments, but their objections cover a vast range of other concerns and the *Interim Report* is wrong to dismiss them as merely about “uncontrollable risk”. It’s kind of the Commission to concede that those who oppose some developments are not “pantomime villains”; perhaps even-handedness might dictate reminding those of us who do oppose certain sorts of development that developers are not necessarily pantomime villains either? As the *Report* rightly points out: “There are some

patterns of development that are inherently unsustainable and will not meet human needs or desires (these should be resisted)". See for example, our report last year on garden communities.[3]

Co-design, co-planning, co-creation of transit-oriented development on Smart Growth lines might offer a way forward. At present it is clear that unsustainable development is simply being imposed from above. As a process, it is not beautiful.

We believe that there are a huge range of entirely rational sustainability concerns involved in objections to new development.

Beauty and Traditional Design

We can all accept that poor design (Section 8.4) is likely to increase opposition to new homes, but opposition to significant greenfield development goes far beyond the design of the homes and their associated infrastructure. A growing number of people now realise that protection of the countryside has importance which far transcends the benefits that open countryside offers to our mental health, our outdoor leisure and our general well-being. Greenfield land provides most of our food, all of our water, some of our timber, much of our flood resilience and supports most of our biodiversity. "Ecosystem services" indeed.

But poor design is certainly a factor in opposition and needs to be addressed. We share the *Interim Report*'s view (Section 7) that one of the things that has gone wrong is building design, but we are unconvinced by all of its analysis of the underlying causes.

The *Report* is right to identify building technology (7.1) as one cause of opposition and although steel frame techniques do predate the 1950s, their widespread use since that time has enabled some truly dreadful buildings to be built, both for employment and residence. The tower blocks of the 1960s were perhaps the worst example, but only by a short head. Sadly the "big block" designs of the Modern Movement were facilitated by these technologies and have generated few significantly beautiful buildings and many eyesores. Many too have proved totally dysfunctional for their intended purpose and for their effects on surrounding communities. However, modern building technologies cannot be blamed for everything. A large percentage of new homes, for instance, still employ traditional techniques, most of which would not be unfamiliar to an Edwardian builder.

The same conclusion might be reached about labour costs (7.1). It may be a factor in "modernism celebrating the machine age", but hasn't prevented the vast explosion of traditionally built houses in the 100 years since World War I, and huge numbers are still being built today.

In its thoughts on the 20th century, the *Interim Report* notes (Section 7.1 and Appendix 4) that "rejection of the traditional settlement's variety and pattern" became an aspect of

inhuman developments. We entirely agree that the rejection in the 20th (and 21st) century of traditional towns and clear centres, composed facades, mix of uses and walkable densities is an important factor. But there's another elephant in this room – traditional architecture.

Ignoring this issue may, of course, have satisfied some elements of the architecture profession and parts of the architecture press but it is, nevertheless, avoiding a major issue. There is, of course, no such thing as a single, traditional architecture; what got built in traditional forms depended on local styles and materials and local regulations (though national trends were equally identifiable) and it evolved gradually but significantly over the centuries. What did for it was the explosion of styles following the Great War and the new techniques the *Interim Report* cites in the later 20th century.

We are unconvinced by the conclusions (7.1) about "pattern book building". The Commission says that "… all attempts to reflect local vernacular styles, distinctiveness, or building materials disappeared in the face of ubiquity and ease of replication". But Georgian and Victorian local builders achieved that uniformity of design which can still delight the eye even in the meanest late-Victorian byelaw homes by using pattern books and applying some simple Classical proportions.

Byelaw homes had an elegance that even modern alterations cannot erase

It is surprising that Classical proportion never gets a mention in the *Interim Report*. One of the worst things William Morris ever did was to attack it. Although a design genius, it was he and his followers who opened the Pandora's box of competing and discordant styles which has continued to this day and which makes minor domestic architecture into the design

“food fight” we all know and hate. Yet your backstreet Victorian builder could apply a few simple rules of proportion and design to even a comparatively mean house, perhaps add a few decorative elements from a catalogue and produce something elegant and well proportioned.

It raises another related issue. Up until about the 1960s, buildings, houses especially, were defined temporally by their design (fenestration in particular). While not definitive, it’s very often possible to say roughly what decade things were built in right back to the 17th century and this is a source of comfort and satisfaction to communities. Such building fashions were disseminated even without mass media (partly by pattern books). Since the post-modernism of the 70s, that’s become largely impossible. Yet that temporal continuity is one of the features can add to the beauty of the urban environment. The sense of continuity and evolution over hundreds of years was, and remains, a source of comfort and satisfaction to communities. While ready to accept that the excesses of the Modern Movement have been a source of dysfunction and ugliness, the Commission does seem very determined to avoid the inevitable conclusion that traditional elements of building design – in new developments too - are both a major contribution to beauty in the built environment and an important aspect of community cohesion.

Prior to 1914, builders, often even without the help of architects, were capable of producing buildings which continue to enjoy public esteem, are sought after (often with prices to match), are generally well built and adaptable to modern standards and needs and are often widely accepted as beautiful. After 1918, a chaotic riot of styles undermined that simple harmony of proportion, scales and materials and, after 1945, the Modern Movement’s “big box” architecture produced many of the most dysfunctional and ugly buildings ever built.

It is certainly not true that following traditional styles will inevitably generate beautiful buildings, nor is it necessarily the case that ignoring them will result in an ugly building. But they do offer a route to beautiful and harmonious building that is likely to achieve the public support the Commission is charged with securing.

We recommend that the Commission’s final report examines what role traditional building design could play in creating beautiful urban spaces.

Terms of Reference

Throughout this response, we have made several mentions of the Commission’s Terms of Reference which were, of course, laid down by the ministers who set up the Commission.

The Terms of Reference set the Commission’s objectives as challenging poor quality design of homes and places and ensuring popular consent for housing. These laudable purposes were undermined by the stated aims which included demands that the Commission’s work focus on establishing garden communities, informing planning and design of new

settlements and persuading communities to consent to land (presumably greenfield) being brought forward for development.

This effectively weakened the enterprise from the start, despite other extremely laudable aims including renewal of high streets, infrastructure challenges and support for under-resourced teams at MHCLG.

Of the five aims, only one has any mention of beauty and the Commission was instructed to focus this on building new settlements, whose main effect on beauty is to undermine the beauty of the land destroyed to create them. Indeed, it is noteworthy that the Terms of Reference contain no reference to natural beauty.

Even accepting that the Commission was set up for "Building Better" as well as "Building Beautiful", this is a serious conundrum. And while the Commission has sensibly largely avoided mentioning the intensely divisive issue of garden communities, the meaning of "better" in this context was always going to be even harder to define than "beautiful".

Conclusions

We understand the Commission's problems with its Terms of Reference, but trying to work with them was always going to pose huge dilemmas. Any public inquiry, however, does at least enjoy the freedom to say its Terms of Reference militate against it producing robust and positive conclusions. We believe the Commission should be prepared to say that.

Our recommendations were stated at the top of this document.

References

[1] Smart Growth UK: *The Overheated Arc – Part 1* [London: Smart Growth UK, February 2019] http://www.smartgrowthuk.org/resources/downloads/Arc_Report_1.pdf

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[3] Smart Growth UK: *Garden Communities – Why Communities are Saying No* [London: Smart Growth UK, April 2018] http://www.smartgrowthuk.org/resources/downloads/Garden_Communities_PR1.pdf