ftwork

ftwork's response to the Planning White Paper consultation – October 2020

About ftwork:

ft'work is a not-for-profit organisation working to create thriving communities and ensure clear social principles underpin development and regeneration. We work across sectors and with a wide range of organisations committed to social change – undertaking research, supporting grassroots initiatives, generating innovative ideas, debating education, practice and policy change. We collaborate at a local level to support projects with advice, evaluation and funding. We are currently looking at how to strengthen public participation in the planning process (with Centre for London); at the civic role of the high street (with Power to Change); and with the RIBA on including the social role of the profession in architecture training. ftwork was a very active 'participant' in the Examination in Public of the Draft New London Plan.

Introduction:

This consultation seeks views *'to modernise the planning process and improve outcomes on design and sustainability'*. The planning system requires change and we support the overall ambition stated in the Foreword: *"We want a society that has re-established powerful links between identity and place, between our unmatchable architectural heritage and the future, between community and purpose"*.

Undoubtedly the current planning system is not fulfilling this social purpose, yet **nor does the White Paper address the means to achieve it.** This is despite the NPPF's '3 overarching objectives' - deemed *'interdependent and to be pursued in a mutually supportive way'*:

- *an economic objective – to help build a strong, responsive and competitive economy…*
- *a social objective – to support strong, vibrant and healthy communities… that reflect current and future needs and support communities' health, social and cultural well-being; and*
- *an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment…*

NPPF: 2.9 continues: *'Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area'*.

These are based, of course on the UN Sustainable Goals. Goal 11 states: *'Make cities and human settlements inclusive, safe, resilient and sustainable'*. 11.3 outlines the following objective: *'By 2030, enhance inclusive and sustainable urbanization and capacity for participatory, integrated and sustainable human settlement planning and management in all countries'*.

In the White Paper proposals, there are frequent references to planning's contribution to economic growth, recovery and renewal; and there are 3 separate Proposals relating to the delivery of environmental sustainability. It is even proposed that Local Plans *"should be assessed against a single statutory "sustainable development" test to ensure plans strike the right balance between environmental, social and economic objectives."* (New Approach to Plan-making). Yet it is striking that there are **no specific proposals** aimed at achieving social sustainability and no consideration of social infrastructure, social heritage, or social value.

Following the consultation, as the proposals are progressed, ftwork would be happy to offer its time to help develop the thinking around how to deliver the important social aspirations set out in the White Paper's Introduction. Meanwhile, here are some statements from the White Paper with which we wholeheartedly agree:

> *"Planning matters. Where we live has a measurable effect on our physical and mental health: on how much we walk, on how many neighbours we know or how tense we feel on the daily journey to work or school. Places affect us from the air that we breathe to our ultimate sense of purpose and wellbeing. This is a question of social justice too. Better off people experience more beauty than poorer people and can better afford the rising costs of homes. As a nation we need to do this better."*

> *"Residents will be able to engage in a much more democratic system that is open to a wider range of people whose voice is currently not heard."*

> *"We want to support local authorities to radically rethink how they produce their Local Plans, and profoundly re-invent the ambition, depth and breadth with which they engage with communities."*

> *"The change we will see – a more engaging, equitable and effective system"*

ftwork's consultation response:

Rather than just highlighting omissions within the proposals, we principally focus here on **key social principles** that need to be included if planning reforms are to fulfil the stated ambitions and to achieve social sustainability. As with the environmental objectives, the social objectives require a clear set of proposals.

First a note of optimism: the pandemic has demonstrated the potential of local populations to be proactive, to be advocates and social entrepreneurs – ie. to have a focal role in shaping where they live and work. People's shared experience of lockdown prompted a remarkable community response in terms of social cohesion, mutual support and innovation. Individuals, organisations and businesses have collaborated across sectors and even across social divides. This **social capital is an extremely valuable resource**, to be supported and sustained; it is the glue that can bring and hold communities together. However this is in sharp contrast to the very low levels of trust that people have in developers and local planning authorities. It is this distrust and disinterest that planning reform needs to address; the motivation and local commitment shown during the pandemic represent an opportunity to be grasped. But there is another reason why this is so important: the coronavirus has also exposed the stark inequalities that exist within communities and that must now be addressed. Planning reform has the means to create inclusive and thriving communities, through an equality of opportunity and access, by arriving at a shared vision which will deliver quality public spaces, housing and social infrastructure.

But a word of warning! If engagement is to be a once only exercise, at the front end of the process, there's a very serious risk of leaving large sections of the population out of the conversation and denied the opportunity to influence the decisions that affect their lives. All the evidence shows that this would be short-sighted: as Sir Michael Marmot and others have demonstrated, the greater the degree of self-determination and ability to influence events, the better the outcome - whether in terms of well-being and health or a sense of local identity and belonging. Greater autonomy builds trust and buy-in, just as failure to engage or address need leads to poor practice and distrust.

The planning reforms can and must work much harder to achieve this 'leveling up' and to involve the broadest range of people in shaping thriving communities with a socially sustainable future. And this is how trust will be rebuilt.

Some key social principles

Pillar 2 talks about the need to turn broad principles into specific standards. We agree that without clear principles to underpin it, the edifice of an ambitious and complex planning system will simply collapse.

1. **Understand, learn from and work with what's already there**
2. **Address identified needs and wishes**

Why? Creates strong local identity and inclusion; reflects diversity; responds to what local people value and need; builds trust and local-buy-in; provides valuable data to determine capacity for growth; helps to identify and understand the particular needs of places and their communities

- major regeneration projects are undertaken without any assessment of the existing economic activity, social and cultural make-up, or social needs of the community.

Yet people are the experts on where they live, they represent its character and community spirit; their sense of security and control is key to future sustainability

- communities are shaped by past social, cultural, physical and environmental influences
- understanding the existing character and context of places is essential in determining their capacity for growth and how they may best develop in the future
- to build on what is there is a better guarantee of economic and social success (rather than displacing businesses and long-term residents)
- a process of formal evaluation, to inform local and strategic plans, will create a valuable picture of the social and physical context in which regeneration and development take place

How? Introduce a requirement for local authorities to conduct area assessments – to define the characteristics and qualities of places, including demographic make-up and socio-economic data, health indicators, population density, housing types and tenure, cultural and heritage assets etc. Then use this baseline social, economic and environmental data to inform Local Plans. Readily available assessment models could be adapted and conducted with the help of local networks. eg. Social Impact Assessment; Needs Assessment

3. **Ensure early and ongoing engagement**

Why? Active early engagement in strategic planning is essential for diverse local groups to begin to shape a vision for their area and ftwork welcomes the proposal; but only ongoing collaboration in development and regeneration decisions ensures transparency and trust, capitalizes on local knowledge of social context and provides meaningful control over the outcome

ftwork fully supports the aim to *'radically and profoundly re-invent engagement with local communities so that more democracy takes place effectively at the plan-making stage'.* Front-end engagement in the preparation of Local Plans is an excellent idea if it gives people a voice early enough in the process to have an influence. Early public participation leads to better development, by harnessing local knowledge and networks, by gaining a thorough understanding of local social context, needs and wishes. It supports autonomy, helps build social capital and collective efficacy and opens up new opportunities for local people and community organisations.

However we strongly believe this cannot be achieved by up-front engagement alone. The reduction of consultation in the design and planning application stages, along with the removal of the right to be heard at inquiries, would lose these benefits and deny people the right to influence important decisions that affect their lives.

- existing weaknesses in public engagement include a lack of transparency and a sense that development is 'done to', not 'done with or for' people

- this results is disinterest, distrust and lack of buy-in

- for communities to engage they must be motivated and know their views count and believe it will make a difference to the outcome. This develops trust

- effective engagement is best enabled by working through local trusted groups and networks, at different levels and in different way – both face-to-face and digital

- it must be properly resourced, with professional support and the offer of training for participants

- Local Plans must reflect their communities and what people value about them, not impose the value judgements of external stakeholders

How? Good engagement in planning is best described as an immersive process, which allows impetus to come from within and which engages a significant proportion of a community in meaningful collaboration. Grass-roots involvement must be built into all stages of the development process. Although costly in time and money, the payback will be in the thriving communities that result.

4. **Broaden the definition of 'social infrastructure'; protect it where it exists and provide for it where it does not**

Why? 'social infrastructure' is not just services and amenities, it has an informal component in the social and cultural structures that bind communities together; regeneration in particular often carelessly destroys existing social infrastructure

There is not a single mention of 'social infrastructure' in the White Paper. Danny Kruger MP recently described it as "structures that exist for local good", as evidenced by the extraordinary COVID-19 response. But this is much more than physical amenities and if the proposed 'Infrastructure Levy' is entirely directed towards affordable housing provision, how will social infrastructure, in its broadest sense, be provided for?

As stated in the Intend to Publish London Plan social infrastructure '*includes health provision, education, community, play, youth, early years, recreation, sports, faith, criminal justice and emergency facilities. There are a wide variety of providers delivering these services, from large state-funded organisations, public and private institutions and specialist providers, to charitable trusts, the voluntary sector, community and faith groups, and individuals. Alongside more formal provision of services, there are informal networks and community support that play an important role…*'

- 'informal' social infrastructure is a product of community – the diverse social networks, representing common interests, that evolve and interact over time

- this unseen social capital is an entirely neglected resource, yet understanding its value is key to understanding local opinion, social needs and what people value

- 'formal' and 'informal' social infrastructure are interdependent. To ensure equality of access and opportunity, both must be assessed and then facilitated

- where social infrastructure already exists it must be protected and harnessed

- it must be provided for in all new developments

How? Social Infrastructure and Needs Assessment models are available and can be conducted with local partners to access social groups and informal networks. Assessments should be referenced in Local Plans and Development Plans, so that proposals for new infrastructure can be carefully aligned with identified need.

5. **Resource and collaborate with known local networks; facilitate them where they don't already exist**

Why? They are widely trusted and are very effective; they possess local knowledge and share information; they enable access to diverse local groups; they provide important continuity and galvanise and coordinate action

- some are bottom-up and community-driven, such as mutual aid groups
- others are Community Interest Companies representing creative and social enterprise, or local business
- when they are good, Community Development Trusts (often jointly funded by local authorities social landlords and/or developers) can play a crucial role in supporting communities through estate regeneration and major development
- Community Land Trusts and Tenant Management Associations place control for aspects of the built environment into local hands

How? Ensure proper funding of this valuable local resource; acknowledge its role in building social sustainability; provide incentives for Community Development Trusts in 'growth area' developments and regeneration

6. **Broaden 'heritage' to include social heritage**

Why? 'Social heritage' (called 'intangible cultural heritage' in the *UN Convention on Human Rights*) describes the local identity that makes each place unique; yet it is intangible and its importance therefore neglected

Proposal 14 relates to *'effective stewardship and enhancement of our natural and historic environment'* yet there is no mention of social heritage. We would like to see an equal commitment to enhancing and protecting the invaluable social and cultural aspects of our towns and cities.

'Social heritage' is the product of time, generated from within or between groups of people, in response to their environment and giving them a shared sense of the past and of continuity. It's responsible for the building of structures, from mundane to grand, that have defined places through history. Often referred to as a 'sense of place' or 'local character', social heritage is widely valued; but because it's intangible and unique to each place, it's

difficult to define and to protect, yet easy to destroy. Places apparently devoid of built heritage value can have a strong sense of place; just as preserving 'built heritage' without regard to social history and context helps create artificial places, devoid of character.

How? The value of 'social heritage' to all communities must be formally acknowledged, so it can be identified and protected. This requires commitment, in policy and in general, to understand existing character and context. It is best achieved in collaboration with local groups: to benefit from their knowledge; to identify the landmarks and institutions that create the local identity; and to commit to protecting them.

7. **Identify and replicate best practice.**

Why? There's currently no mechanism for doing this; using exemplars of design and practice will raise standards of both national and local design codes; good development examples/protocols are especially valuable

There needs to be a proper evaluation of what innovators are doing (not least how the economics stack up), so that others can be encouraged/required to follow their example. This is about sharing approaches that deliver social as well as environmental and economic benefits, not about delivering on 'social value' KPIs.

- good engagement practices for large developments (Grosvenor; U+I)
- local authority development arms – local for local people (Brick by Brick)
- local authority-funded social housing to meet local need (Goldsmith Street)
- new investment models – eg. long-term 'slow burn' investment model
- collaborative working across sectors
- design review (of which there's no mention) plays an important role in encourage best practice and ensuring quality
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How? Design review, post-occupancy surveys, a national register of design excellence

ftwork's response to other specific proposals:

Proposal 1: The role of land use plans should be simplified

ftwork supports the simplification of land use plans, because it will require proper assessment and provide clarity around what is and is not permitted; but with the following provisos:

- there must be a means of ensuring that areas are not overwhelmed by one type (eg Growth Areas) at the expense of others; how are communities to have a say on local requirements?
- that decisions are arrived at through consensus with local communities, not imposed on them

- that the process is transparent and based on evidenced local need and opinion

- that decisions are not driven by commercial negotiation and financial gain

- that the definitions allow for sufficient flexibility to encompass, for instance, areas that are not suitable for development, but are not otherwise protected

- that the three types allow for community-led site proposals to be identified and included

All types of site will need to be agreed and clearly allocated within the Local Plan, to ensure they are subject to proper scrutiny and consideration by local communities. Similarly local design codes will need to have been consulted upon and agreed early enough so that they can be applied to specific sites. We would stress that early engagement and consensus will build trust and avoid the type of local resistance that currently contributes to delay.

Proposal 9: Neighbourhood Plans should be retained as an important means of community input

ftwork entirely believs that it is essential not just to retain but to greatly expand the use of Neighbourhood plans, however the White Paper proposes to significantly reduce their scope and value. They need to be properly resourced and, as with Local Plans, training and professional facilitators need to be made available to participants to ensure a broad and representative range of voices.

Proposal 11: Local design guidance and codes

It is people that bring life to places. Planning should be about providing for and responding to their needs, yet instead it has become a speculative process driven by economic expediency. ftwork supports the idea of a national design code to establish and uphold principles of good design and placemaking, but our concern is that in the drive for simplification the messy issue of real people, their needs and their wishes, will be side-lined.

We fear, as a result, local design codes will be reduced to a set of pattern books. Good design that responds to people and local character will produce variety, creativity and innovation. Places need to be distinctive and respond to context. This is why architects matter! The alternative will be yet more faceless places with no sense of their own identity. It is therefore essential that local design codes are developed with the meaningful collaboration of local communities, with an assurance that they will reflect local circumstances and therefore protect the unique sense of each place.

We cannot see how this can be achieved within the constraints (not least time constraints) of developing a Local Plan. How can the process be both swift and also fair, transparent and open to challenge? This proposal needs much more thought. To what extent can design standards control other important aspects of place such as local needs, namely climate

change, social equity, and well-being? A clear set of values needs to be derived, applied and monitored – not just a design code.

The appointment of a chief officer for design and placemaking can provide necessary leadership but must not dictate. This is not a substitute for good designers and good planners, so the system must be properly resourced, with effective skills training put in place (including professional training).

Proposal 14: We intend to introduce a fast-track for beauty through changes to national policy and legislation, to incentivise and accelerate high quality development which reflects local character and preferences

The proposals claim to place emphasis on 'encouraging a much greater focus on design quality at the local level'. But we must not confuse 'beauty' with design quality. '*We must ask for beauty*', says the Building Better Building Beautiful Commission, which they define as *'everything that promotes a healthy and happy life, everything that makes a collection of buildings into a place, everything that turns anywhere into somewhere, and nowhere into home'*. We commend them for trying, but there's the difficulty – 'beauty' defies description, it's slippery, it's in the eye of the beholder. Yet they add… *'So understood, beauty should be an essential condition for the granting of planning permission'* and *'the topic of an ongoing debate between the public and the planners, with the developers bound by the result'*.

Frankly that's absurd. By all means let's debate beauty, but such a subjective term cannot be pinned down as a planning objective. More usefully they explain beauty at 3 scales:
- *'Beautifully placed: sustainable development patterns sitting in the landscape'*
- *'Beautiful places: streets, squares and parks, the "spirit of place"'*
- *'Beautiful buildings: windows, materials, proportion and space'*
…concluding *'this means accepting that new development should be designed to fit into the life and texture of the place where it occurs'*. ftwork can entirely agree with this last point, but the 'spirit of place' is not about the arrangement of physical spaces, it's about people and how they use and value the spaces around them.

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ftwork,
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