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# **Paper for Planning Research Conference, Anglia Ruskin University, April 2010**

## **Title**

### **Design Review: What place in Urban Design Guidance for Democratic Planning Decision Making**

#### **Introduction**

Design Review (DR) is intended to expand design expertise in the planning decision making process. It is a largely voluntary service with DR panel members appointed by local government at the regional level. DR panels are a non statutory consultee for major planning applications and masterplans. Although DR comments themselves are not statutory the Commission for Architecture and the Built Environment (CABE), the government's design advisory body, who initiated the DR process in England, does however have statutory power to conduct design reviews, as embodied in the Clean Neighbourhoods and Environment Act, 2005. DR comments can be a material consideration in determining planning applications but the weight of this consideration is theoretically and legally less important than advice from a statutory body such as English Heritage, or advice contained in up to date adopted Development Plan policy ( as in section 38 of the Planning and Compulsory Purchase Act, 2004). In practice, however, DR comments appear, from various studies (CABE, 2009; Amelio Consulting,2008 and Design Commission for Wales, 2009), to be given considerable weight in planning decision making, although it is hard to compare the weight given to the various sources of advice as this is generally not closely monitored. CABE has raised the profile of urban design issues in planning considerably since its inception in 1999 and DR has the highest profile in this regard (Wilding, 2009). 71% of all panels have been established in the last 5 years (CABE, 2009).

CABE view the planning system as instrumental in helping to achieve better quality urban design but consider that there is a lack of design expertise in Local Planning Authorities (LPAs) where most planning decisions are made. Research carried out by CABE shows that there are relatively few staff employed in LPAs with a specific qualification in Urban Design, Architecture or Landscape Architecture (CABE, 2003). This research did not, however, examine the nature of the qualifications held by planners which often includes some urban design training. There is also an implicit assumption that the amount of design advice available to LPAs is insufficient, or that

LPAs are not able to interpret and apply it fully. This has been questioned by some LPAs who maintain that planners already have abundant design guidance and planners are trained to make urban design judgements based on available guidance and site observation (CABE, 2009). Most planners, however, agree that the principle of additional design expertise through DR is welcome. With LPAs being under-resourced in design and conservation staff, and the average planner having a large workload, this view is not surprising. Ideally, in the longer term, the necessary expertise should perhaps be available in-house in LPAs.

Exactly how useful and rigorous DR is, and what weight should be accorded to DR panels' views, is the central area examined in this study. In other words where should DR panel comments sit within all the sources of urban design information available to planners? Without some clarity on the place of DR in the wider governance of DR there is likely to be some confusion at the least, and perhaps questions about the legitimacy of DR.

The nature of the DR process is examined first, followed by a review of recent critiques and assessments, before the primary research relating to this study on the regional DR panels is explained and analysed.

Finally some suggestions for improving DR as a process itself are considered as well as suggestions for improving the wider urban design governance process within which DR sits.

## **DR as a service to LPA's and Developers**

Local design expert panels that advise LPAs have existed for several decades in some areas within the UK. The term DR, however, came into existence with the advent of CABE in 1999. CABE initially set up a national DR panel and since then CABE and the Regional Development Agencies have helped to set up regional panels in England as well as some specialist panels including an Olympics panel, Crossrail, Eco Towns, Schools and National Health Service. The specialist panels are usually funded by the organisations whose schemes are subject to the DR panel so bringing into question their independence. A Welsh panel is run by the Design Commission for Wales (DCW) and a DR panel for Scotland is run by Architecture and Design Scotland (ADS). In Scotland there are also separate panels for Edinburgh and Glasgow. Northern Ireland carries out DR within a government advisory group but does not have a dedicated DR panel as for the rest of the UK.

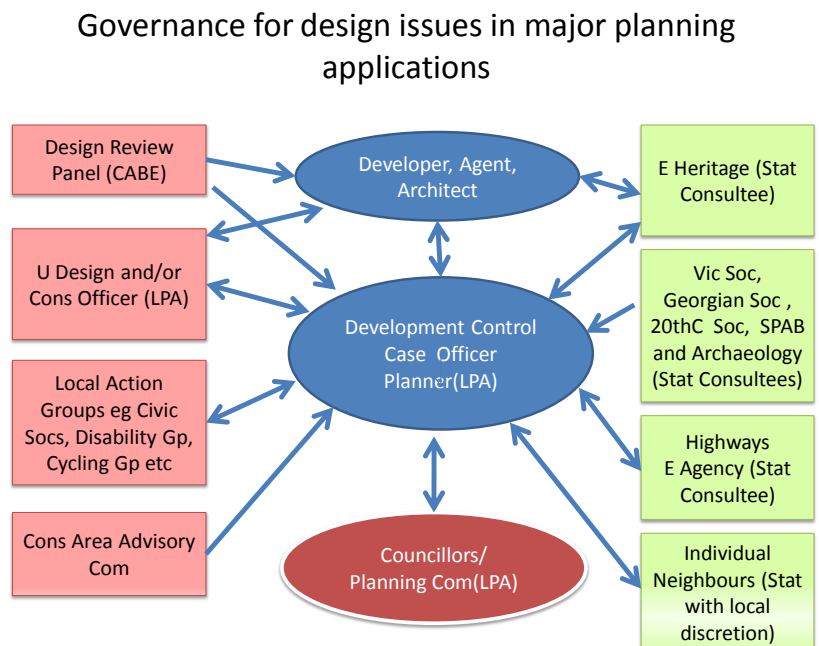
DR panels are comprised of various design professionals although many have a predominance of architects (CABE, 2009). Panel members are normally selected through a process of competitive bidding to the body designated to oversee the

running of the panel. Panels have regular meetings where they review master plans, but more often development proposals usually at pre planning application stage and sometimes in the presence of the developer and/or architect and a representative from the LPA. The panel, or at least the panel chair, may visit the site in question.

Once the panel has made comments these can be used by the architect or the developer to amend a scheme before submitting to a LPA, or by the LPA to request amendments to the planning application. The comments are not, however, binding on any party.

DR comments are only one of many sources of urban design advice that might influence the planning decision. The place of the DR panel as a consultee and key player in urban design governance is set out below in Fig 1. This illustrates the main players in planning decision making positioned centrally with the statutory consultees to the right and the non statutory consultees to the left. A one directional arrow indicates where advice comes from and who it is given to and a two directional arrow indicates there may be negotiation or two way communication. Fig 1 does not illustrate the place of the various UD policy documents as that is not within the scope of this paper. The work of Punter, J and Carmona, M (1997) in this respect is referred to under data analysis below.

**Fig 1**



Note: EH equivalent in Scotland is Historic Scotland and in Wales is Cadw; CABE equivalent in Scotland is ADS and in Wales is DCW

## The Impact of the DR Service

The most recent research on the operation and impact of DR has been carried out by CABI (2009) and by (or on behalf of) some regional panels including the Yorkshire and Humberside panel (2008) and the Welsh panel (2009). Edinburgh City Council produced a report on the Edinburgh DR panel in 2010 which revealed a different approach to England and Wales. There has also been some recent academic debate on the DR process and this is discussed below.

In 2009 CABI, The Royal Town Planning Institute (RTPI), The Royal Institute of British Architects (RIBA) and the Landscape Institute (LI) commissioned the most extensive research on the DR process to date. Its aims were to address the shortcomings of DR, to increase the impact of DR and to ensure the panels are providing good quality design advice. An interview survey (CABI, 2008) of design review panels was heavily relied on as the main data source for the 2009 report. The research report states “the key measures of success are the extent to which a scheme is improved on the basis of the panel’s advice and whether the LPA has used the advice to approve or refuse an application”. However there is no systematic monitoring in place by any of the panels so these key measures of success could only be estimated.

Some of the key findings as set out in the CABI (2009) research include:

- 91% of LPAs felt there were benefits in involving design panels within the development management process
- The main perceived benefits were the panels’ objectivity, independence, knowledge and expertise
- 9% of LPAs thought DR panels had a negative impact due to slowing the application process by a non statutory body with little local or contextual knowledge and sometimes poor expertise. Some felt there was sufficient in house expertise and panels did not take account of local planning policy
- 38% of LPAs thought DR panels had an influence compared with 80% of panel members, and this is perhaps more revealing of the relative perceived importance of DR panels.

There were other findings given less prominence in the CABI (2009) research, such as although most panels had aims and objectives these were very general and none appear to have agreed criteria against which to assess schemes. Such criteria might ensure consistency, fairness, transparency and ease of interpretation and it seems to be an omission that this was not examined other than briefly in relation to CABI’s own “Building for Life (BFL)” criteria. 46% thought BFL influenced their comments although BFL was not used systematically as a checklist. These wider criteria would be relevant for developers but not usually for LPAs. Another allusion to some criteria in principle being used occurs in the discussion on report writing of DR comments: “comments need to be clearly based on design principles that have been established in legislation and guidance”. But there is no discussion on what legislation or

guidance is being referred to. Attempts to define “good design” and “good design review” are included but are very general and do not substitute for criteria against which to assess schemes.

The CABA (2009) research does reveal that some improvements are needed and these are further investigated through the primary research for this paper. The suggested improvements arose mainly from LPA interviews and include more transparency in how recommendations are arrived at, better communication with LPAs and developers, more recognition of LPA policy, better management of conflicts of interest, and a system of independent monitoring.

Integreat Yorkshire commissioned Amelio Consulting to undertake research on local design panels in Yorkshire and the Humber in 2008 just before the Regional panel for the area was set up. This research involved in depth interviews with nine panel managers and structured interviews with a sample of the design panels’ customers (developers and LPAs) plus four focus groups. The main findings included:

- The majority of panels’ comments result in moderate or significant change to a scheme. This is despite a statement earlier in the Yorkshire research paper saying there are no monitoring systems in place and it is extremely hard to attribute changes in a scheme to one influence or another. Hence this finding is assumed to be an estimate by the interviewees.
- The DR process did appear to provide planning officers with greater confidence to reject poor design. Also from a developer viewpoint good design is often supported by DR and the comments assist in negotiating with planning officers.
- Improvements could be made by having better promotion of DR, improving training for all participants, achieving greater consistency between all panels and having robust monitoring.
- DR should be voluntary, not statutory, with positive encouragement to engage in the process.
- DR should be delivered in the context of a package of design enhancement tools including pre DR enabling (help with mechanisms that might lead to good design), post DR mentoring (help for those receiving DR comments with interpretation/resolution) and design awareness activities for non design experts in planning decision making.

These findings corroborate the CABA (2009) research to some extent, but for both the claims of significant changes to schemes as a result of DR can not be fully substantiated in the absence of a detailed monitoring system. The package of design enhancement tools referred to in the last point above appears ambitious and costly.

The Welsh research (Design Commission for Wales, 2009) also suggested a training role for DR panels in the form of open advice surgeries but the resource implications are acknowledged. Again, similarly to the Yorkshire research more strategic interventions are suggested such that there is more ongoing influence on scheme development. These suggestions may be helpful given the resources, or they may in fact add to the complexity of an already complicated Urban Design governance situation to the detriment of accountability and clarity.

Other suggestions from the Welsh research include the need for systematic monitoring incorporating an annual tour of completed schemes that had been subject to DR, for reflection by all involved, and clearer, less ambiguous DR reports.

The Edinburgh City Council report (2010) reveals that the Edinburgh panel already considers proposed urban design policy and uses the Council website to communicate the nature of DR. Another key difference in Edinburgh is that the panel is selected by relevant local organisations nominating members. This may be more representative and accountable than the English model but may involve compromise on securing the best expertise.

An insightful exchange of views on DR appeared in the journal "Town and Country Planning" August/September 2009. David Lock (a well respected planning consultant and a DR customer) began by comparing DR to the laudable traditional architectural "crit" (the tradition in schools of architecture and civic design of constructive criticism by a tutor or peer group). He then comments that "although the CABE package sounds good, it isn't. The design review is a dreadfully shallow process." He complains that DR panel members may have inappropriate expertise, are inadequately briefed and most are not familiar with the site in question, having not visited. Furthermore the rules of engagement, he points out, are not clear.

Richard Simmons, the chief executive of CABE, responded to Lock in the September 2009 edition of the same journal stating "CABE is the public's guardian of good design", appearing to give CABE an unquestionably high status. Simmons insists panel members are well briefed although the primary research for this paper does indicate there may be a problem here. Simmons also states that 70% of schemes considered by DR panels have been improved with panel advice, but it is clear from the research discussed above that the monitoring systems are insufficient to be able to conclude so exactly. There was no subsequent discussion about how the rules of engagement by DR panels could be improved so an opportunity was missed to have a constructive dialogue that might lead to better mutual understanding and a better DR service, with a greater appreciation of the place of DR within the wider urban design guidance.

A perspective from a Development Control Planner on the decline of specialist design staff in LPAs and how planning decision making should encompass urban design has a different focus to that of CABE and does not appear to view DR as a

key tool (Hagyard, 2009). Hagyard is acutely aware of the need to reinvigorate the design emphasis of planning. He calls for having urban design as a core skill for planners and he questions whether urban design guidance is robust enough. He also stresses the importance of high level support within LPAs on design issues, and sending clear messages to developers at an early stage as to what the LPA expects. Developers frequently do not employ sufficient design skills and he believes it should be compulsory to have a qualified architect on all major schemes. He mentions design panels briefly but clearly sees the key players as developers and his/her own design advisor as well as the planning case officer. The implication is that both of the key parties should be well enough trained in design, there should be more high level design posts in LPAs and the design guidance should be clearer, so that DR panels and other advisors may be less necessary. This appears more efficient in terms of governance and communication but may not be realistic in the foreseeable future.

Case Sheer (1994), writing on DR in the USA in terms of power and justice, considers that DR is not an efficient mechanism for improving the built environment as it can be used politically and is lacking in democracy. Clearly DR in the USA some years ago may not be directly comparable with the UK now but the process appears similar and the criticism is echoed in some of the current UK literature.

## **The Primary Research Method**

Given that previous research on DR has not been fully independent, but mostly commissioned by the bodies running DR panels, it is hoped that this research will offer a more independent view, and will explore the developer perspective as well as the LPA and DR panel perspective.

The DR panel sample for interview included the nine regional DR panels in England, the CABE national panel, the London Olympics panel, the Welsh and Scottish panels, so covering a wider geographical spread than the CABE research. The regional level was considered appropriate rather than the local level as the regional level presents a manageable volume of interviews for in depth questioning, and the regional layer has recently become more formalised as the recognised level for referral of significant schemes.

A representative of each of the 13 panels was interviewed by telephone, and through a chaining process (panel member suggestions, as well as examining design reviews and parties involved through the CABE website) a LPA planner and developer contact who had been subject to DR by each of these panels was also interviewed by telephone. A total of 33 interviews were carried out (13 panel members, 11 planners and 9 developers or their agents). The response rate was high with 85% of the sample selected responding.



The interviews were semi structured with the panel interviews being more structured than the others as they aimed to gather a greater proportion of factual information on the operation of the panels, whilst also seeking opinions on how the process may be improved. The planner and developer interviews were more in depth and qualitative as more probing was used to elicit opinions as customers/users of the service, as well as opinions on the links between DR and wider design guidance and policy.

The questions were grouped around six categories for all respondents:

- the way in which the panel members are selected
- how the schemes being considered by panels were selected and at what stage of the development process
- the role of the panel and key player perceptions of this, including the role of panel comments in relation to other urban design advice from consultees or policy documentation
- the significance and influence of the panel comments mainly in terms of amendments to schemes emerging as a result of panel comments
- potential problems with the panel operation and how to overcome these including accountability, conflicts of interest, lack of criteria used by panels and the relative weight to accord the panel's comments in the planning process

## **Data Analysis**

The data was analysed manually as the sample size allowed for this and the data was largely qualitative in nature. Frequency of the same or similar responses was recorded in order to establish whether there was a majority view on the main areas of questioning. Also innovative suggestions were noted even if by a minority. There was a rich body of data emerging from the planner and developer interviews in particular on suggestions for improving the DR panel operation and also suggestions for re-assessing the way the panel comments are used alongside the large volume of other Urban Design guidance and policy. These suggestions were listed and grouped according to topic and again frequency of mention. Finally a critique of the suggestions made is put forward making reference to relevant literature.

### **Common points emerging from respondents supporting the DR process:**

The majority of all interviewees thought DR comments had a significant influence on the evolution of the design of a major development scheme. The majority of schemes considered by panels were amended as a result of DR panel comments either through direct discussion with developers at pre-application stage (most common) or through the LPA asking for amendments post submission of an

application. As information on amendments attributed to DR are not recorded it was not possible to obtain quantitative data on this point.

The panel composition is usually mostly architects with some allied professionals. Most respondents considered the selection process to be fair (often through open advertising), but a minority (mostly planners) considered there was an insufficient balance of interests/professions on the panels. This is likely to reflect the historical tension or power balance relationship between architects and planners, including different views on how urban design issues should be considered.

All respondents (except one developer) thought the DR panels were useful, although for different reasons. Some panel members felt they filled a skills gap in LPAs and developers frequently considered that the panel comments helped them back their ideas when negotiating with the LPA (they viewed the architect dominance of panels to be an advantage here). Planners commented that panel comments could help justify refusal of planning permission and helped increase planning officer confidence and training.

### Common points emerging from respondents critical of DR panels

Most respondents considered that the role of the panels was not as clear as it could be to the key players and the public. Most also felt that the way schemes are selected to be considered by a DR panel was lacking in clarity. Although most panels sent at least one member to visit the site under consideration most felt more thorough site visits involving more members and provision of better briefing was needed. Better communication is needed according to most, especially between panels and LPAs, on comments generated at pre-application stage so that LPA is familiar with panel advice to potential applicants before LPA undertakes pre-application discussions. Councillors and the public need more information about the DR role: one respondent suggested use of a video. The Edinburgh panel is chaired by the LPA so facilitating communication, although this might compromise the independence of the panel.

Planners more frequently raised some fundamental concerns about the nature of the panel assessment: the lack of criteria used to perform assessments against, the lack of structure or relation to local or even national planning policy and lack of understanding of the planning system were all mentioned. This appears to link with the contention that few planners are included on DR panels or that they are certainly in a minority. One planner referred to “too many cooks” giving design advice and the difficulty of resolving this (especially where both English Heritage and CABE are involved) and the panel having a very wide interpretation of design in the planning context which might extend to internal issues and general sustainability issues.

Both developers and planners appear concerned that there can be conflicts within the panel (minimised if there is a strong chair) and between different sittings of the panels with different panel members if a scheme is returned to the panel at a later date for some reason. Perhaps surprisingly accountability and conflicts of interest (perhaps with panel members knowing an applicant) were not noted as particular problems. Most thought that panels did not need to be accountable as their independence is their strength or that they were already accountable through being publicly funded by the Regional Development Agencies. All thought formal monitoring of DR impact is needed, and some suggested this might be done through planning officer case reports and/or annual reviews of a sample of cases.

Panel members were least critical of the DR process, not surprisingly, as they have the greatest vested interest in the panels.

## Points emerging as suggestions for improvements

Some of the following suggestions corroborate with the literature and others go further.

Probing on use of criteria against which panels could assess schemes gave rise to various suggested criteria, but the “Building for Life” (BFL) criteria (CABE, 2005) was mentioned most frequently. A small minority of panels and LPAs use BFL criteria already but the majority of panels use no criteria, preferring to rely on the value of experience alone.

One suggestion to assist communication was to require incorporation of DR comments in the Design and Access Statement (DAS) submitted with the planning application. Submission of a DAS with most planning applications has been a legal requirement since 2006 (Paterson, 2009).

Another suggestion relates to the communication between some key consultees, particularly English Heritage and CABE, and the resolution of their differences which might be helped by merging them as one body at least as a statutory consultee on design and conservation. The feasibility of this approach is indicated through some joint publications, for example guidance on high buildings (EH/CABE, 2007).

As a way to help link the DR process with local design policy formulation, and facilitate panel members understanding of the planning system they work within, a specific additional function of DR panels would be to input to new or amended LPA policy on urban design (as Edinburgh already does).

A more fundamental and far reaching suggestion relates to conceiving of a system or route map to enable the whole plethora of urban design guidance and advice from various bodies at national and local levels (including DR) to be more readily understood and user friendly. The use of a dedicated website such as [www.rudi.net](http://www.rudi.net),

a comprehensive and widely used urban design website, was suggested as a vehicle that might achieve this end as it could be constantly updated with ease. Another suggestion was a Planning Policy Statement (PPS) dedicated to urban design that would bring together references to urban design in various existing PPSs at national level as well as capturing what is available at local level in terms of types of relevant documents, noting their weight or status.

Punter, J and Carmona, M (1997) proposed a typology of urban design policy noting the varying degrees of specificity in policy levels: this could usefully form a part of an urban design route map. It did not cover urban design advice from consultee bodies and how this is processed: this is considered in more detail in the following section.

### Some critical thoughts on the suggestions for improvements

The BFL criteria are widely known about and accepted but they are non statutory and very general so in that sense not the obvious candidate for the most important criteria. BFL does not use some of the most recognised urban design language such as “permeability” or “legibility”, although it alludes to these concepts, and some BFL criteria do not appear to be within the remit of planning such as use of advanced technology, interior design and reference to the Building Regulations. Nevertheless, according to one LPA interviewee in this study, the government department of Communities and Local Government (CLG) appear to be making adoption of BFL as local policy a condition of grant funding to LPAs for certain regeneration schemes. Perhaps a further study of a greater range of possible criteria might be appropriate before recommending any one set of criteria. The suggestion of formally using BLF in DR does, however, move the debate on further as there has been no documented discussion relating to use of criteria in DR thus far.

DR comments in DAS might help but would still not address the communication gap between DR panels and LPAs prior to a planning application being submitted (as DAS is submitted with the application). Although the suggested link with DAS is helpful and could be applied it might also be necessary to have the panel give the LPA all comments as they arise (even if the developer wishes a scheme to remain confidential at that stage) so the LPA is fully informed when conducting any pre-application discussions with potential applicants.

An EH/CABE merger would in theory be helpful for planning officers and developers as a simplification step, but in practice there would be several barriers. Each organisation would claim they represent unique territory although both have urban design within their remit, albeit EH is confined to the historic environment. CABE, however, can and does cover historic areas in DR and in other ways. There is likely to be cultural and political opposition to a merger as EH is more reserved when it comes, for example, to modern design within historic contexts than CABE. On the

positive side the two bodies have worked jointly on tall buildings guidance (EH/CABE, 2007) and mergers can free up more resources to address new initiatives and force a re-examination of values, aims and objectives.

Linking DR with local policy formulation would have many benefits for the DR process but might slow down policy making further. If the role was limited to a one off consultation on any emerging policy or even to suggesting new policy areas, with the planning officers being responsible for developing ideas further, this might present a workable proposal.

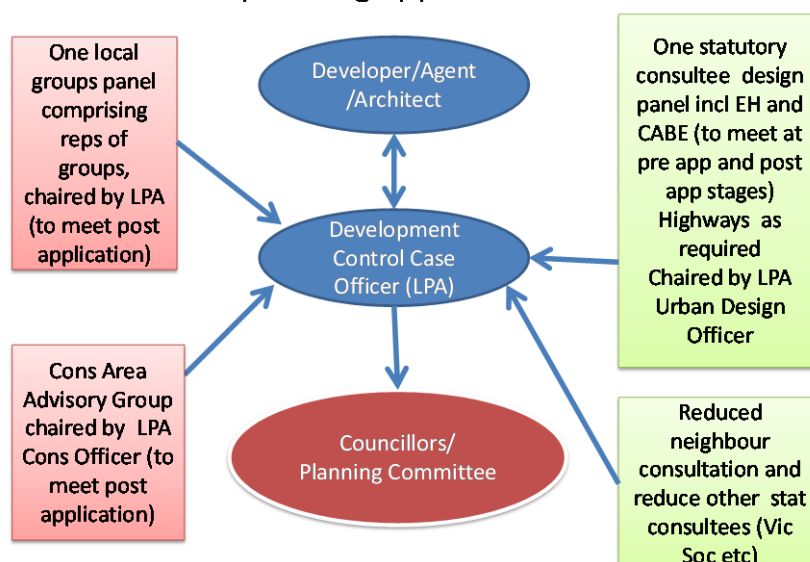
A dedicated PPS on urban design might carry more weight than use of a website as a means to provide an urban design route map, although a web site could be used in a supporting role with the advantage of being simple to update. Most key players could benefit from this by clarifying the extent and relative importance of the full range of urban design guidance available (through policy or consultees). A flow chart or similar may be incorporated for ease of illustration. Notice of cancellation of out of date or little used guidance could be made known this way too.

A proposed scenario that might be incorporated in a route map to show the place of the DR panel as a consultee in urban design governance is set out below in Fig 2. This should be contrasted with Fig 1. The proposed scenario would see a single *statutory* panel on design, including EH and CABE, and would be chaired by the LPA to facilitate communication only. There would be more negotiation between the players within panels before giving advice to the case officer, and similarly for non statutory consultation. Consequently there would be less negotiation focussing on the case officer making that role more manageable and helping speed of decision making. The democratic element should not be compromised as all the current players would still have a role, albeit reduced for some.

The Urban Design Alliance, a network for all professionals involved in urban design, has recently examined skill levels and capacity (UDAL, 2009) and may be an appropriate vehicle to develop a route map further.

**Fig 2**

**A possible new governance for design issues in major planning applications**



## Conclusion

DR is becoming increasingly influential in shaping the design of major new development. This influence is mainly at the pre-planning application stage, but continues throughout the application process.

DR fits well within the discretionary British Planning system that allows for considerable judgement, negotiation and third party involvement around the point of decision making. Other, particularly European planning systems, with an even stronger emphasis on the supremacy of the development plan compared to the UK, and less discretionary by nature, are unlikely to accommodate such an approach so easily.

The scope for judgement by planning officers and third party involvement maximises the democratic dimension of planning but militates against speed of decision making. The *extent* of third party involvement is controversial in this context. An effective balance of speed and democracy is at the heart of sound governance but is politically hard to achieve. Fig 2 attempts to address this.

DR represents a third party involvement with, according to some, a remit that is not well enough defined and this in itself could compromise speed as well as democracy. To extend the DR remit further into training, enabling, policy development and mentoring as has been suggested by some, could possibly benefit quality of outcome but at the expense of speed of decision making.

To address the lack of clarity on the DR remit the literature and primary research has given rise to suggestions. These suggestions include the use of some recognised urban design criteria, e.g. BFL, by DR panels when assessing schemes. In addition better briefing of panel members about the scheme in question, and the planning system as a whole, as well as a clearer role for DR in relation to other urban design advice has been suggested. There is a clear consensus on the need to monitor DR impact although further research is required to determine an appropriate method. Clearer, more balanced, statutory design panels would address many of the criticisms of the CABE model for panels, especially relating to communication and justice. Ultimately the approach on this issue is likely to be a political judgement.

Alternatively, in the longer term, if skills within LPAs were improved, the guidance was streamlined or set within a route map, and there were more high level design

staff in LPAs the need for DR might reduce. This would simplify and perhaps improve the planning decision making process.

In the meantime CABE, DCW and ADS, through DR, are certainly raising the profile of urban design issues and at the present time the existence of DR, with some modifications, appears useful overall.