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If beauty is the answer, what is the question?
A discourse analysis of beauty within national planning policy

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Being a dissertation submitted to the faculty of The Built Environment as part of the requirements for the award of the MPlan City Planning at University College London:

I declare that this dissertation is entirely my own work and that ideas, data and images, as well as direct quotations, drawn from elsewhere are identified and referenced.

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ABSTRACT

Whilst beauty is often considered to be in the eye of the beholder, planning policy has taken it upon itself to pursue a consensus for beauty. This agenda was introduced within the 2021 NPPF as a social objective alongside the Planning for the Future White Paper which aimed to provide a 'fast-track' to beauty through local design codes. This thesis conducts a critical discourse analysis of national planning policy documents alongside published consultation responses to the policy reform, with the intention of revealing underlying assumptions, governmentalities and unbalanced power dynamics. A methodological framework was employed, combining the WPR approach, established by Bacchi, asking 'what is the problem represented to be?', with Hajer's framework for discourse analysis of environmental policy. The analysis establishes that the word beauty is used as both a political and economic device to achieve consensus amongst the public as opposed to solely being a 'high-level statement of ambition' for social benefit as claimed by MHCLG. This research has been conducted through a critical lens of social justice, whereby the discursive, subjectification and lived impacts of the policy are assessed against the criteria for a 'just city'.

"An environment can be shaped to encourage participation

or it can be structured to intimidate, control, or oppress people.

When design becomes humane, it not only fits the shape,

movements and uses of the body; it also works with the conscious

organism in an arc of expansion, development, and fulfilment.

This is a goal that a deliberately articulated aesthetic can help accomplish.

A participatory aesthetic can be a powerful force in transforming

the world we inhabit into a place for human dwelling"

Berleant 2005:25

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LIST OF FIGURES

ACRONYMS

BBBBC - Building Better Building Beautiful Commission

CLG - Communities and Local Government

DLHC - Department of Levelling-Up Housing and Communities

LA - Local Authority

MHCLG - Ministry of Housing Communities and Local Governments

NDG - National Design Guidance

NMDC - National Model Design Code

NPPF - National Planning Policy Framework

PDR - Permitted Development Rights

1.0 INTRODUCTION

Beauty is often followed by a justification that it belongs in the eye of the beholder, yet recent UK planning policy has decided to take beauty into its own hands. In 2018 the government set out the BBBBC to produce a report which would "advocate for beauty in the built environment" (BBBBC, 2020:140). The resulting Living with Beauty Report (2020) along with its supporting research papers aimed to provide insights into the current understanding of what beauty means within the built environment and the ways in which it manifests within the city. This report went on to inform the 2020 Planning for the Future White Paper (hereafter White Paper) and resulted in the inclusion of beauty as an agenda within the NPPF.

Much of the controversy over the BBBBC has arisen from the pursuit of beauty as a method of social and environmental change, with many echoing Harvey (1996) that planning as a discipline should not consider form or aesthetics and instead should focus on the social forces of the city. It can be acknowledged, however, that there are two different notions of concepts in planning and design (Matilla 2002). On one hand, planning exists in pursuit of justice and equity forming part of welfare policy, on the other, urban planning and design can be seen as aesthetic disciplines with the goal to produce beautiful surroundings and environments to be experienced. Whilst there have been debates surrounding the appropriateness of beauty within planning policy, what has received less attention is the assumptions and problem representations which lie within this recent pursuit of beauty by the government.

Whilst it is difficult to argue with the ambition to strive for beauty in the built environment, this thesis aims to challenge the assumption that the inclusion of the word beauty within policy is synonymous with a social objectives as suggested within the NPPF. It shifts the attention away from the dominant focus within planning research on the decision making process (Jacobs 2006), towards a critical analysis of discourses within planning policy. Furthermore, it takes an approach to policy analysis which does not look to policy as a set of responses or solutions, instead, it considers policy as a form of governance, arguing that planning policy is itself ideological and political in its nature.

The thesis takes the inception of beauty within the 2021 NPPF as its starting point and conducts a discursive analysis of the documents which led to the policy reform. Namely, the research looks to the informing BBBBC reports and the consultative White Paper. The research also incorporates responses from the 2021 NPPF and NMDC consultations as well as some of the responses to the 2020 White Paper consultation to explore how a range of stakeholders responded and interacted with beauty within policy.

1.1 CONTEXT

Historical context of Aesthetic Control

Beauty as a concept is not something often mentioned within planning policy. McDonald suggests that the roots of the urban planning profession are however grounded in pursuits of beauty, formed from an "awakened desire for urban beauty as a counterpoint and antidote to the nineteenth-century industrialisation of cities [and] its perceived ugliness" (McDonald, 2012). We can see this within the original aims of the 1909 planning act "to secure the home health, the house *beautiful*, the town pleasant, the city dignified and the suburb salubrious" (Punter, 1986a:352 emphasis added). However, more contemporary conversations of planning often disregard the concept of beauty; instead focusing on more social and economic forces at work in the city, with design guidance being kept practical with a focus on quality.

Such design guidance in planning has been termed 'aesthetic control', defined as the "exercise of planning control over the external appearance and visual impact of development" (Punter, 1986a:351). Punter has documented the history and changes in aesthetic control within the UK planning sector throughout the 20th century (1986a;1987). Whilst these accounts do not consider contemporary methods of aesthetic control, they highlight the longstanding tensions and developments in attitudes towards it from the perspective of various stakeholders including architects and developers. Punter (1986b:198) argued that methods of aesthetic control within planning, including policy, ignore the complex sequence of design decisions and negotiations which occur outside of the planning application process, pointing out that other stakeholders, such as architects and developers, view such controls as 'imposition of taste'(Manser, 1979; Meades, 1979).

Tibbalds (1988) explored the reasoning behind this dispute of aesthetic control, highlighting an early shift within planning, from concerning issues of a physical and material nature within the city, to more social science related matters. He suggested that this change in focus left a void where professionals within the built environment blamed each other for declining urban quality (Carmona, 1998:175). As such, the gap of responsibility for urban design between architects, planners and governing bodies grew, resulting in a continual side-lining of design concerns within planning (ibid.). Such a lack of accountability for the urban aspect of design quality, was recognised by the former Secretary of State for the Environment, John Gummer back in 1995:

> "... the buildings which we construct and the space which we create have an impact on people's lives for centuries. [Yet] we are so determined not to choose that we leave it all to chance. So buildings are not seen or considered in context. The neighbourliness of architecture is not prized. And the urban scene is increasingly a mere clutter of construction." (Gummer, 1995, p. 8)

Whilst methods of aesthetic control and planning policy have changed along with the rise of the urban design discipline, the rhetoric remains much the same with echoing tones from Robert Jennerick, former Secretary of State for Housing, Communities and Local Government:

> "*Our current planning system is broken. It doesn't deliver beautiful homes, and it importantly doesn't deliver nearly enough homes…*" (Jennerick, speech given at the Creating Communities Conference 2020)

Modern Policy Context

The first NPPF was published in 2012 under the coalition Conservative, Liberal Democrat party in 2012 and since was revised in 2018, 2019 and most recently 2021. The original premise for the policy framework was to provide pro-growth strategies on a national scale to replace the regional policies and Localism Act of a prior Labour government (CLG 2012:1). The goals of 2012 NPPFs were focused on urban economic and sustainable growth measures in the UK, with any mention of beauty referring to natural existing landscapes. The most recent version of the policy, however, has updated its social objectives to include beauty as an agenda:

> "…a **social** objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, **beautiful** and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being…" (NPPF, 2021:5 emphasis added)

Such a marriage of aesthetics and social welfare, opens up a wider discussion around creation, distribution and consumption of aesthetics within the city; posing questions of democracy and power relations within the context of planning policy and its formulation.

1.2 RESEARCH GAPS

As the policy is relatively in its infancy, much of the research surrounding the 2021 NPPF reform and design has focused on its effectiveness in practice. Earlier this year, Place Alliance (2022) published a report, *Appealing Design*, which looked at the change in planning appeal decisions based on the new directive for quality design within policy, concluding that the "odds for design"(Carmona and Giordano, 2022) had significantly improved[1].

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[1] This was not in relation to beauty specifically but considered quality of design and considerations towards design.

This thesis takes an alternative approach by considering the ways in which issues are represented to be problems in the NPPF, through an exploration of how the policy shapes and constitutes such problems. This thesis uses the policy as text for discourse analysis following a framework which asks "What is the problem represented to be?" (WPR). Developed by Bacchi (1999; 2009), WPR aims to uncover specific problem representations within policy with an interest in the assumptions and conceptual logics upon which policy narratives are based. As such, the methodology and context of this thesis contributes to original research within the planning field, offering insights into power relationships and knowledges which are hidden within the planning policy formulation process with a specific focus on beauty.

1.3 RESEARCH QUESTIONS

Based on the context outlined above, and the conceptual framework established within the following literature review, this paper aims to explore the underlying socio-political discourses within the planing policy on beauty through a critical lens of social justice theories.

As such, the research questions are broken down into analysis of representations, assumptions and impacts of the policy, and are as follows:

1.   *What does beauty represent?*

This initial question aims to interpret what problem is implied from the promotion of beauty within the NPPF.

2.   *What assumptions does this policy rely upon?*

3.   *Why the word 'beauty'?*

Question 2 and 3 aim to reveal the underlying discourses within the policy and their genealogy.

4.   *Who receives beauty?*

5.   *What is the cost of beauty?*

6.   *Who is responsible for creating beauty?*

Questions 4, 5 and 6 aim to link the analysis back to the motive of the thesis by interrogating the impact of the policy on people, and thus social justice.

2.0 LITERATURE REVIEW

The following literature review forms a theoretical framework, bringing together concepts of beauty, social justice and the politics of planning policy. All three topics are complex and well documented within themselves, therefore, the following account provides a short summary of overlapping theories, constructing a framework which the subsequent research rests upon.

The thesis acknowledges the complexity of defining beauty by focusing on aesthetics within the broader definition of beauty. Beauty is not a feature of objects which remains constant, but instead interacts with its surroundings and context over time (Nanay, 2019:8-11). Therefore, in order to situate beauty within the context of policy, theories of aesthetics have been incorporated. *Aesthesis* translates from Greek as perception and Alexander Braumgarten, who introduced the concept of aesthetics in 1750, defined it as the study of sensory experience (ibid.). Therefore, aesthetics can be used to define the experience of beauty through perception of the built environment.

The review begins by exploring philosophies of beauty, aesthetics and justice within the built environment through theories of subjectivity, morality, distribution and the 'Just City'. The discussion then focuses on modes of justice formed through participation and representation, looking to philosophies of communication and discussion within the context of discourse and policy creation. Finally, the review considers the political context of the current planning system, discussing neoliberal governmentalities which underpin much of today's politics, providing a rationale and background to the use of discourse analysis within urban policy.

2.1 BEAUTY, AESTHETICS + JUSTICE

Philosophies of beauty in the city

Much of the modern literature surrounding beauty and architecture comes from Sir Roger Scruton. His philosophies on the objectivity of beauty and how beauty is experienced within our urban environments are visible throughout the BBBBC which he chaired before he passed away in 2020. Whilst Scruton has written extensively on the philosophy of aesthetics and beauty in architectural design (1983; 1979), he also acknowledges the need for a communal sense of experienced beauty within a city as an entity. He argues that this emerges from an understanding of beauty, where the collection of objects, or in this context of buildings, creates a harmonious beauty which highlights and accentuates the beauty of one object or a building above another (Scruton, 2011:11). This situates beauty within the conversation of urban planning by identifying the way in which beauty can appear in the collection of buildings within a city compared to common discussions of beauty within architecture.

Other philosophers have specifically considered the positioning of aesthetics within the scope of the city experience. Haapla (2005:42-45) considers the role of aesthetics to be associated with a 'sense of place' defined through factors such as geological specifies, cultural history and emotions of familiarity. He argues that an understanding of place requires recognition that its existence and influence are connected to personal identity. Carlson adds to this by asking how exactly we appreciate aesthetics within the environment beyond critiquing individual cases of architecture. He critiques Scruton's methods describing them as a "designer landscape" approach, which he argues fails to appreciate the ecology and wider landscape surrounding individual pieces of architecture (Carlson, 2007:47-49) .

The hegemonic view that beauty is subjective within the urban environment, which Haapla touches upon in his discussion of aesthetics, can be seen to derive from Kant's original work on the Critique of Judgement. Kant argued that beauty is a democratic way of compelling us to be better (Hove, 2009). He believed that beauty is subjective in it's individuality, consistent with other philosophers at the time, such as Hume, who argued that, "Beauty is not a quality in things themselves; it exists merely in the mind which contemplates them; and each mind perceives a different beauty" (1757). What distinguished Kant's philosophies on beauty from others at the time was his concept of 'disinterested pleasure'. Kant argued that true beauty seeks nothing from purpose or function of the object, and as such, beauty can only exist in a disinterested way where an object holds no particular purpose, rendering it irrelevant from architectural or planning discourses.

Scruton used elements of Kant's work to further illustrate its sense of universal value. Scruton argued that beauty is an ultimate value in the same way that truth and good are, and therefore suggests beauty belongs to the nature of reasoning. "One needn't ask why something is good or true - they just are, in the same way something may be just beautiful" (Scruton, 2011:2). However Scruton disputed Kant's notion of disinterested pleasure by arguing that beauty can be found within objects and experiences which also serve a purpose such as architecture and urban environments.

Justice and Beauty

Eliane Scarry argues that beauty can pave the way to greater justice through a conceptual lens. Whilst her works are not specifically related to the field of planning or policy, she defends beauty against the dismissive political arguments which often render beauty as an object of privilege and thus secondary to more important issues (Scarry, 1999:58). Scarry considers the experiential aspect of beauty through the viewer rather than the object. Similarly to Kant, she believes that the experience of beauty can lead to a "wordless certainty"(Scarry, 1999:29) that leads the observer to a search for truth, something which Scarry believes to be a crucial condition for justice. She writes, "The beautiful […] acquaints us with the mental event of conviction, and so pleasurable a mental state is this that ever afterwards one is willing to labour, struggle, wrestle with the world to locate enduring sources of conviction-to locate what is true" (Scarry, 1999:31).

Whilst Scarry's concepts can be seen to be difficult to extrapolate for physical application due to their theoretical nature, her works can be read alongside Scruton's philosophies to argue that beauty is an experience which should be considered a universal, social and moral good and thus pertains to social justice.

Justice in the aesthetics of the City

The idea of bringing social justice into the realm of the city, and thus, planning discourse has reemerged through Susan Fainstein's works in *The Just City* (2010). Fainstein calls for the creation of more 'just cities' by pursuing three critical values: equity, diversity, and democracy (2010:66) (fig.1). Whilst she doesn't specifically discuss aesthetics or beauty within *The Just City*, she has previously explored the notion in a prior paper (2006) where she discussed beauty as an example of collective good within a city. Fainstein identified an "underlying assumption that low-income people do not care for amenities. In other words, it is implied that city beautification matters only to urban elites and that working class people care only for material benefits." (2006:17). Despite recognising this injustice, Fainstein does not expand on how to create a more aesthetic or appealing city which may be accessible to all, instead she argues that a "good city form or environmental sustainability,'' are elements of a more expansive investigation (Fainstein, 2010:58).

Within Fainstein's works, she cites Sherry Arnstein's argument that, by boosting the role of disadvantaged groups in the formulation and implementation of policy, the redistribution outcomes are greater (Fainstein, 2010:64). Arnstein believed that without a redistribution of decisional power, the redistribution of benefits cannot be fully realised. Fainstein supports this by arguing that planners should encourage citizen participation in order to provide policy makers with local knowledge in order to make the policy and decision making process as democratic as possible (Fainstein, 2010:67). Applying this to aesthetic control, one can understand this as a push for increased public participation within the creation of the policy surrounding the design of their local environment.

EQUITY	DIVERSITY	DEMOCRACY
1. New housing developments should provide units for households with below average incomes - the goal being to provide suitable living conditions and decent homes for everyone.	1. Household should not be forced to move for the purpose of obtaining diversity, but neither should new communities further segregation.	1. Groups and individuals who are not able to take part directly in decision making processes should be represented by advocates.
2. Housing units developed to be affordable should continue to remain so and be replaced on a one for one replacement.	2. Zoning should be inclusive as opposed to discriminatory.	2. Plans should be developed in consultation with the target population if the area is already developed. The existing population however should not be the sole arbiter of the future of an area. Citywide consideration must also apply.
3. Businesses and households should not be involuntarily relocated for the purpose of obtaining economic development or forms of community balance.	3. Boundaries between district should be porous.	3. In planning for sparsely occupied/as yet uninhabited areas, there should be broad consultation that includes representatives of groups currently living outside the affected areas.
4. Economic development programs should prioritise smaller, more locally rooted businesses and their employees over larger corporations.	4. Public spaces should be widely accessible and varied. Where such public spaces are provided by private entities, political speech should not be prohibited within the property. Simultaneously, groups with clashing lifestyles should not be forced to occupy the same location.	
5. 'Megaprojects' should be subject to heightened scrutiny, be required to provide direct benefits to low-income people through: - employment provisions; - public amenities; and - a living wage. If public subsidy is involved, should include public participation in the profits.	5. To the extent practical and desired by affected populations, land uses should be mixed.	
6. Intracity transport (excluding commuter rail) should be kept minimal.	6. Public Authorities should assist groups who have historically suffered from discrimination in achieving access to opportunity in housing, education and employment.	
7. Planners should take an active role in deliberative settings by pushing for more egalitarian solutions to direct away from ones which disproportionately benefit the well-off.		

Fainstein, 2010:172-175
TABLE. 1 - Fainstein's three critical values

Aesthetic Justice

More specifically related to aesthetics, are the works of Monroe Beardsley (1982). Beardsley proposes a specific form of justice called aesthetic justice, where the distribution of goods is considered with sensitivity to the nature of aesthetic perception. According to Beardsley, 'Aesthetic Justice' should be considered a distinct field of justice that pertains to the distribution of goods with aesthetic quality. Much like Scarry, he argues that experiencing aesthetic objects is a necessary part of the 'good life' and public policy should be concerned with creating better access to such objects and experiences. However, challenges arise within this argument when attempting to define the aesthetic value of an object to determine its distribution (Feldman, 2011). Beardsley defines aesthetic value as "the capacity of objects, situations, events and so forth ... [to] raise the aesthetic level of experience significantly," thus acknowledging that no one object or event will be aesthetically pleasing in the same way for everyone based on context, diverse tastes and backgrounds (Beardsley, 1982). This subtly agrees with Haapla and Carlson's assumptions. However, Beardsley goes on to conclude that in order to achieve aesthetic justice, there must be increased access to places where

experiences or objects may be reflected upon for their aesthetic value. Beardsley's ideology, therefore, gives the responsibility of aesthetic experience to creators and artists as the purveyors of beauty, which in the context of the built environment can be seen as the architects. However, a key distinction must be made within the discipline of urban planning, as urban spaces are not only observed but also lived in. Therefore the responsibility for the creation of aesthetics has an arguably greater impact on those experiencing it and, as such, lies not only within the hands of the architects but also government and planning.

Walzer's Spheres of justice (1983) considers the distributive nature of justice based on "shared social meanings of goods."(Walzer, 1983) He believes that social goods should be distributed according to their social meaning as opposed to moral value in order to create equity. Young (1990) complements Walzer's theories by further exploring the nature of power and cultural imperialism in the formation of social justice. She argues that the main issue with modern distributive justice, in general, is its dated grounding in the enlightenment-based idea of the homogeneity of the public (Matilla, 2002).

Matilla (2002) considers such theories of aesthetic justice and distribution within an urban context, arguing that aesthetic justice should look beyond a distributive model of justice to consider the process of design and production and conception of the built environment, thus involving modes of aesthetic control. Young explores this further by considering the relationship between power dynamics and social justice. She uses Foucault's theories to argue that social justice should not be considered in terms of distribution as it concerns more than the division of material goods (1990:24-28); instead, justice should be considered in terms of "institutional organisation"(1990:8) as they are subject to "collective decision"(ibid.). Again, Young's theories aren't specifically written within the context of aesthetics, however, they hold strong parallels to the power challenges faced by the idea of controlling aesthetics which arise from Kantian theory.

Kant's dominant theories of disinterested aesthetics have been challenged by Bourdieu (1984:469) in particular who highlights its elitist nature. Considering aesthetics through a social justice lens can reveal power relationships between those creating and implementing aesthetics and those receiving and experiencing them. Applying this concept to the context of planning policy raises questions of agency of aesthetics within the built environment in terms of power dynamics, taking it beyond issues of its distribution.

2.2 SOCIAL JUSTICE + PARTICIPATION

Agency and collaboration

As discussed above, much of planning's involvement with aesthetics manifests in the form of control and regulation through policy and the decision making process. This poses important questions of power and agency in the creation of developments and cities through policy. Jones (2001) has explored these power dynamics between the architect and the planner within the context of participation and communication in

design reviews. In agreement with Young and Walzer, Jones argues that, "The concept of public welfare, […] the constitutional basis for aesthetic control of the built environment, becomes transformed into the welfare of a special interest group able to develop hegemonic control over design review processes and the visual appearance of the built environment."(2001:35). This results in a lack of diversity both in aesthetic and social terms, and highlights the issues involved with unbalanced agency of aesthetics of the decision making process.

Healey has taken Young's concepts of distributive justice and employed them specifically within the planning process, advocating a more democratic and collaborative decision making process (Healey, 1997). Healey acknowledges the heterogeneity of the public and the issues which this creates for both distribution and plan-making decisions with her solution drawing on communicative consensus-building practices, where she argues the participants "learn about each other, about different points of view and come to reflect their own point of view" (Healey, 1997:33). The majority of contemporary theories surrounding communicative planning, including Healey's, do not specifically address aesthetics. The aversion to aesthetics within a consensus-building communicative practice may stem from issues of subjectivity which arise from philosophical concepts of aesthetics. Reconsidering Kant's views on aesthetic judgement, such judgements are considered disinterested and therefore cannot be proved by argument or reason if attached to purpose or function. However, following this line of thought renders aesthetic decisions obsolete in the built environment if there is no need to provide reason and no room for disagreement (Matilla, 2002). Matilla argues that communication and collaboration within planning processes could be viewed as an education of aesthetics between participants which can help promote social justice within the built environment.

Spaces of Appearance

Arendt's concept of 'space of appearance' can be used as a theoretical model to situate participation within planning policy formulation. Arendt describes 'space of appearance' as a domain in which people "come together in action and in speech, exhibit concerns for the common object, and engage in collective agency" (Björkdahl and Selimovic, 2016:321). Here, the visibility of stakeholders and actors produces a power, which is identified as "the potential for collective action"(ibid). This can be read within the context of Habermas' theories of the public sphere. Habermas defined the public sphere as a virtual community, "made up of private people gathered together as a public and articulating the needs of society with the state" (1989:176), without existing within any tangible or identifiable space. Through acts of communication and dialogue, the public sphere forms opinions and attitudes which, in its ideal state, go on to guide governments' agendas. As such, the public sphere can be defined as the source of public opinion needed to legitimate authority within a functioning democracy (Kneller, 2000).

Arendt's 'space of appearance' can be seen to agree with Habermas with a focus on the way in which dialogues in the public sphere take place. Within her works, Arendt argues that the space of appearance

must be perpetuated through constant action; it exists through the coming together of actors within the context of deliberating public concern, once this ceases, the space of appearance no longer exists. This brings rise to an additional dimension of continuity within the context of policy. Whilst the formation of policy may invoke spaces of appearance through collaborative processes, as suggested by Healey, the inception of documents fixes the discussions into rigid documents, ending conversations and debate, causing the space of appearance to disappear in part.

Agonism

A principal facet of Arendt's theory is 'agonism', which, through collective action can be understood as an essential component of participation within policy formulation. Agonism makes the central case for further theories within political thought, evident through Kompridis'(2014) works on the aesthetic turn. His works do not consider the politics of aesthetics, but rather the way in which political thought is formed through aesthetic modes of thought. It relates heavily to discussions of agency within planning policy formulation, looking to themes of agonism, consensus and exclusion. The aesthetic turn argues that attempts to achieve consensus within politics produce spaces of exclusion. In such a way Kompridis considers aesthetics beside the ethical as opposed to moral, and demonstrates that by striving for consensus on what is considered good, ignores the plurality of contemporary societies and perpetuates existing hegemonic orders (Mouffe 2013). This agrees with Young and looks to rectify power dynamics and issues of social justice through participation and agonism.

Within the context of urban planning and aesthetics, Healy's works on communicative planning processes have been connected to Habermas' theory of politics by Matilla (2018). Habermas argued that questions concerning the ethics of a "good life" hold no prospect of consensus or universal agreement (Habermas 1989, Matilla 2018). On the other hand, moral questions are contextual and form norms as a way of consensus. Habermas considers aesthetics alongside morals, and much like Scruton, gives them a status upon which a form of consensus may be achieved.

Elements of Kant's critique of judgement can be used to unite agency, agonism and aesthetics. For Kant, aesthetic judgement is a public judgement, where one considers something to be beautiful with the expectation that others will agree with that judgement. Crucially, however, Kant believed aesthetic judgements cannot be justified or validated by arguments as they are based on individual opinions. This is used to argue for a sense of consensus within aesthetics through moral judgement, however, when read alongside the aesthetic turn in politics, it raises questions of space for dispute and agency within the formulation of policy if consensus is assumed. This brings us back to Fainstein's values for a 'Just City' and the call for democracy (Fig.1). Within this request for greater democracy, Fainstein asks for greater representation of the wider population which would include conflicting views, which, supported by Healey, would suggest increasing collaborative processes within policy formulation.

2.3 THE POLITICS OF URBAN POLICY

Hierarchy of Policy

The way in which planning policy impacts development plans can be seen through the hierarchical structure of documents and guidance from the national to the local level fig.(1). Within this multi-level structure of governing, local and regional bodies must conform with the policies put in place by government led national bodies. In planning practice, this means that regional and local development plans must conform to the national level strategic policies. This would suggest that the multi-level governing structure within the planning system is hierarchical and operates within a top-down manner (Auerbach, 2012).

This translates into design policy as demonstrated within fig. (2). The NPPF, NDG and NMDC all go on to inform regional policy in London and local policies in the rest of the country. As such, the national policy has great influence and should be interrogated in terms of the power it holds and the discourses which underpin its rationale and policies .

BODY   SCALE   PLANNING POLICY DOCUMENT

DEPARTMENT FOR LEVELLING UP, HOUSING & COMMUNITIES   NATIONAL → NPPF NATIONAL PLANNING POLICY FRAMEWORK

DEVELOPMENT PLAN

GLA GREATER LONDON AUTHORITY   REGIONAL → LONDON PLAN   SPGS SUPPLEMENTARY PLANNING GUIDANCE

CITY/DISTRICT/COUNCIL LONDON BOROUGHS   LOCAL → LOCAL PLANS

PARISH/TOWN COUNCIL → NEIGHBOURHOOD PLAN
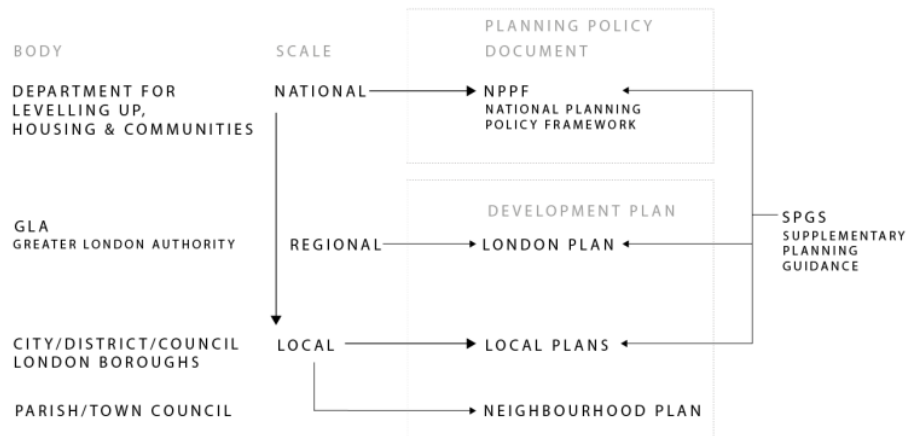
Fig. 1 Hierarchy of planning policy

DOCUMENT/GUIDANCE

NATIONAL

DLHC
(FORMERLY MHCLG)
DEPARTMENT FOR
LEVELLING UP,
HOUSING & COMMUNITIES

DESIGN COUNCIL
(FORMERLY CABE)

OFFICE FOR PLACE

NPPF
NATIONAL PLANNING POLICY FRAMEWORK
BBBBC
LIVING WITH BEAUTY REPORT
NATIONAL DESIGN GUIDE
NMDC
NATIONAL MODEL
DESIGN CODE

REGIONAL

GLA
GREATER
LONDON AUTHORITY

LPG
LONDON PLAN GUIDANCE

THE ARCHITECTURE
DESIGN
AND URBANISM PANEL

TFL
TRANSPORT FOR LONDON

Small Site Design Codes LPG
Housing Design Standards LPG
CHARACHTER AND CONTEXT SPG
Public London Charter
Optimising Site Capacity: A Design-led Approach LPG

GOOD GROWTH BY DESIGN
Architecture + Urbanism Framework
(PENDING)
London Housing
Design Guide

Station public realm
design guidance

LOCAL

EXAMPLE GUIDANCE

LA
LOCAL AUTHORITY

Residential Design Guidance
Shop Front Design Guidelines
PUBLIC REALM DESIGN GUIDANCE
Shop Front Design Guidance
Extensions, Basements and Conversions Guidance
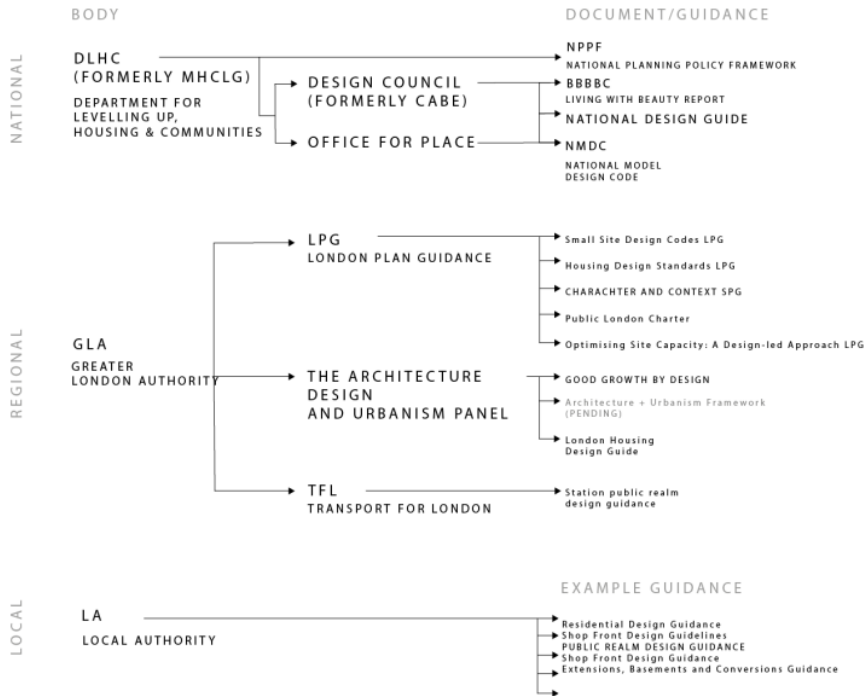
Fig. 2 Hierarchy of design based planning policy

Governmentalities of Policy

An understanding of planning policy as embedded in politics opens up the discussion to modes of governance and thus governmentalities. This paper looks to an analysis of discourses as a way to uncover those governmentalities within policy text. Foucault's (1979:2) analysis of governments and power relations explored "the reasoned way of governing best and, at the same time, reflection on the best possible way of governing". As summarised by Lemke (2007:47), Foucault's analysis of government considered 'the practical conditions under which forms of statehood emerge, stabilize and change", leading Foucault to develop the concept of governmentality.

Foucault (1991a) looked at control by exploring the way states pursue their agendas through governing themselves and their citizens and interrogating how this creates an environment in which citizens govern themselves. He used what he coined, 'technologies' of government, encompassing, semiotic, material and political devices (Lemke, 2007) to understand modes of governing. Alongside this, he also explored the way in which the state governs according to "rational principles which are intrinsic to it and which cannot be derived solely from natural or divine laws or the principles of wisdom and prudence" (Foucault, 1991b:97). State rationality, therefore, is considered a system of thinking about the practice of government, forming a

tool with which tactics of governing may be scrutinised. These two ways of looking at governance are what Foucault termed governmentality - "the tactics of government which make possible the continual definition and redefinition of what is within the competence of the state and what is not" (ibid; 103).

Neoliberalism in planning

An important shift in UK governmentality can be identified within the New Labour approach from the 1990s. Allmendinger and Haughton (2013) argued that the deregulated and market-led approaches of a Thatcher government created "uncertainty and risk for developers, who sought certainty over plans for an area before committing themselves to substantial investments"(11). This then led to a revision of such deregulatory aspects with a 1997, New Labour central government using planning as a way of promoting economic growth agendas, framed discursively as being congruent with social and environmental agendas (ibid). As such, New Labour planning policies attempted to reframe the pursuit of economic growth as an enabler of pursuits in social justice (Allmendinger and Haughton, 2009:2547).

Davies (2014) emphasises that: "The political success of neoliberalism lies partly in its capacity to harness arguments about *both* justice *and* political transformation, and to locate these within an economic context" (193, emphasis in text). As such, Davis suggests that neoliberal governance can be seen to make space for social justice rather than ignoring it (ibid; Ferguson, 2009). However, he also highlights that this type of governance pursues social justice according to economic and market-led approaches and, as such, whilst it may discursively give space to social justice agendas, this space is formed by, and thus secondary to, the pursuit of economic and growth-based agendas (Jessop, 2002; Raco, 2005). This further demonstrates how "planning is inevitably embedded in politics, reflecting and adapted to what…we call the spirit of the times" (Friedmann, 2008:248).

Policy as Discourse

Analysis of public policy through a lens of governmentality has been widely explored, however, a disconnect can be seen between frameworks for public policy research and majority of urban policy research (Jacobs, 2006). The hierarchical structure of planning policy, and its political influences (fig1), provides the opportunity to analyse power relations within urban policies through the lens of governmentalities and knowledges. The methodological framework for this thesis, therefore, reflects the concepts outlined above, manifesting in an approach to policy analysis which explicitly uses "policy as discourse"(Bacchi 199:39-48; 2000, Goodwin 2011).

Those who have considered discourse analysis within policy do so in response to the notion that the language used in policy is a medium "through which ideas and an objective world can be represented and discussed"(Ockwell and Rydin, 2010:172; Darcy, 1999). As such, discourse analysis can highlight ways in

which policy positions are held by the way 'problems' are linguistically framed (Scrase and Ockwell, 2009). This specific position, links traditional frameworks used within urban policy discourse analysis to Bacchi's set of questions asking, 'what is the problem represented to be?'.

In approaching the urban policies concerning beauty introduced in the 2021 NPPF, discourse analysis allows for an investigation of "meaning-creation" (Bacchi 2009:7) within policy and is concerned with understanding the implications of the discourses which arise. Such an approach to policy analysis exists with the assumption that there is never an objective or singular perception of a policy issue and that language used within policy depends upon assumptions and ideologies and, as such, is ambiguous and cannot be shared by everyone. As such, understanding policy as discourse, as "text that is subject to interpretation", allows for the space for the contestation of policy, to test "truth claims" within those discourses, to "consider or imagine alternative ways of developing policy and practice" (Goodwin, 2011:170).

Ockwell and Rydin (2010) highlight the potential for discourse analysis within environmental politics, demonstrating that the way in which it provides an understanding of "policy actors and the dynamics of policy processes more fully" (2010:170). In relation to urban planning there are two established methodologies of discourse analysis. One being Hajer's framework, which focuses on Foucauldian theories of knowledge and power (Ockwell and Rydin 2010:172), and the other being Dryzek who looks to apply Habermas' concepts of communicative rationality (Dryzek, 2000). Both can be considered within the context of inclusive and deliberative modes of communication, illustrating that many of the new modes and innovations within policy communication, such as Healey's, arise from the engagement within policy as a discursive process. This thesis focuses mainly on Hajer's framework which breaks down discourse analysis into three devices: metaphors; storylines and discourse coalitions to uncover power and knowledge relations as theorised by Foucault.

3.0 METHODOLOGY

This chapter lays out the methodology used within this thesis and justifies the approach as appropriate for the research questions. It details the steps taken to identify secondary data which was used as well as outlining the methods of analysis. The chapter also includes a reflective critique which positions myself as the researcher within the context of the topic in order to highlight issues of subjectivity within the process of discourse analysis. The section concludes with ethical considerations as well as limitations of the outlined methodology.

3.1 APPROACH

Given the subjective nature of beauty and the explorative focus on social justice; a qualitative research approach was considered more suitable as it offered the opportunity for a more in-depth understanding of the processes and complexities involved in shaping the social world and built environment (Limb & Dwyer, 2001). For the sake of constructing an in-depth analysis of the problem representations within policy, methods of discourse analysis have been chosen as touched upon within the literature review.

Discourse analysis is used within many disciplines, each pertaining to their own forms of methodologies and assumptions and therefore does not follow one specific method or sequence of research methods. It has been described as "something like bike riding…which is not easy to render or describe in an explicit manner" (Hoggart, Lees and Davies, 2002:165). Discourse analysis can be most simply described as a qualitative method of looking at texts which pays critical and analytical attention to "the connections between language, communication, knowledge, power and social practices" (Muncie 2006:74). Therefore, text can refer to "any actual instance of language in use" (Fairclough, 2003:3), and within the context of policy analysis, can refer to "political text and talk" (Van Dijk, 2002:208).

This paper looks towards Hajer's theories (2006), briefly outlined within the literature review, and applies them to Bacchi's (1999; 2009) public policy analysis framework. As such, a specific set of questions and steps for analysis are formed which allow for discovery of discourses within a specific policy in relation to power dynamics, knowledges and problem representations.

3.2 METHODOLOGICAL FRAMEWORK

Bacchi's framework (1999; 2009) comprises of 6 questions which guide the researcher through an analysis specifically designed for problem representations within policy texts. By shifting the focus away from research on the decision-making process and the effectiveness of policy, towards a critical analysis of planning policy, the paper aims to uncover bureaucratic modes of control in order to identify conflicts between ideologies and power which brings rise to questions of justice within the city.

Bacchi's WPR approach creates a framework of seven steps which can be used as a method of inquiry to connect the conceptual framework to the research question or hypothesis. These steps have been critically reflected on using Hajer's three devices of metaphors, story lines and discourse coalitions (2006) resulting in the framework outlined in Fig.3 and expanded on below:

1. *What's the 'problem' represented to be?*

    This aims to explore what Hajer terms 'metaphors' within policy (2006:68). Bacchi describes this as a "clarification exercise" (Bacchi, 2009:3) encouraging the researcher to work backwards to interpret what problem is implied from selected policies. The goal of this is to reveal the problem representations which may be explicit within policy texts themselves (Bacchi, 2009:3).

2. *What Presuppositions or assumptions underlie this representation of the 'problem'?*

    This involves considering both epistemological and ontological assumptions which hold up the problem representation identified within question 1. This seeks to uncover "deep-seated cultural values" (Bacchi, 2009:5) that underpin the policy discourses as well as forms of knowledge upon which the representations rely.

3. *How has this representation of the problem come about?*

    The third question looks to Foucault's (1984) concept of genealogy, to determine how knowledges are produced and the power relations which enable hegemonic knowledges. As such, this question has the potential to question the "taken for granted status of contemporary problem representations (Bacchi, 2009:10-11) to open up different ways of thinking to reveal spaces for "Challenge and Change" (Bacchi, 2012:23). We can see this question as connected intrinsically to question 2 through uncovering what Hajer describes as the "Story Line" (2006:69), the narrative behind the conception of discourses.

4. *What is left unproblematic in this problem representation? Where are the silences? Can the problem be thought about differently?*

    This begins the process of "problematising the problematisations" (Bacchi, 2009:12). It considers what the policy texts do not problematise, highlighting voids where perspectives may be silenced by dominant problem representations.

5. *What effects are produced by this representation of the 'problem'?*

    This question links back to the initial purpose of the WPR approach, to interrogate the effect of policies on people and thus social justice. It reminds us of the role of discourses as a set of "practices with material consequences" (Bacchi, 1999:2), allowing us to see how problem

representations "function to benefit some and harm others: (Bacchi, 2009:15). Question 4 and question 5 both draw on Hajer's concept of "discourse-coalition" (2006:70). He describes this as a way of "measuring the influence of a discourse"(ibid) through identifying whether people use it in conceptualising the world and whether the discourse solidifies into practice.

6. *How/where has this representation of the 'problem' been produced, disseminated and defended? How could it be questioned, disrupted and replaced?*

   Here, Bacchi asks us to look outside of policy to seek ways in which this representation of the policy has been featured through other streams such as media and education streams. It looks at the way in which actors and agents have questioned the discourse, highlighting the necessity of understanding varying perspectives within the methodology. This has been done through the integration of consultation responses within the analysis as a constant reflection of stakeholders perspectives.

7. Finally, Bacchi encourages the researcher to apply the list of questions to ones own problem representation to critically analyse "oneself and ones thinking as part of the material to be analysed" (Bacchi, 2012:22). This is often referred to within discourse analysis practices as reflexivity and is based upon Foucault's notion that the researcher themselves "cannot be separated from the discursive formations in their field of policy study" (Ockwell and Rydin, 2010:172). As this paper does not aim to propose alternative policy, as suggested by Bacchi, the reflexive statement is positioned before the analysis chapter "to help the research audience understand the choices made" (Sharp and Richardson, 2001:203)

Bacchi highlights that these questions, whilst acting as a framework, should not be rigid in their order and instead should form a guiding set of questions for interrogation. Therefore, whilst the given order of these questions informed the method for the research, the written analysis condenses much of the work to provide a coherent argument and structure to the following chapter.
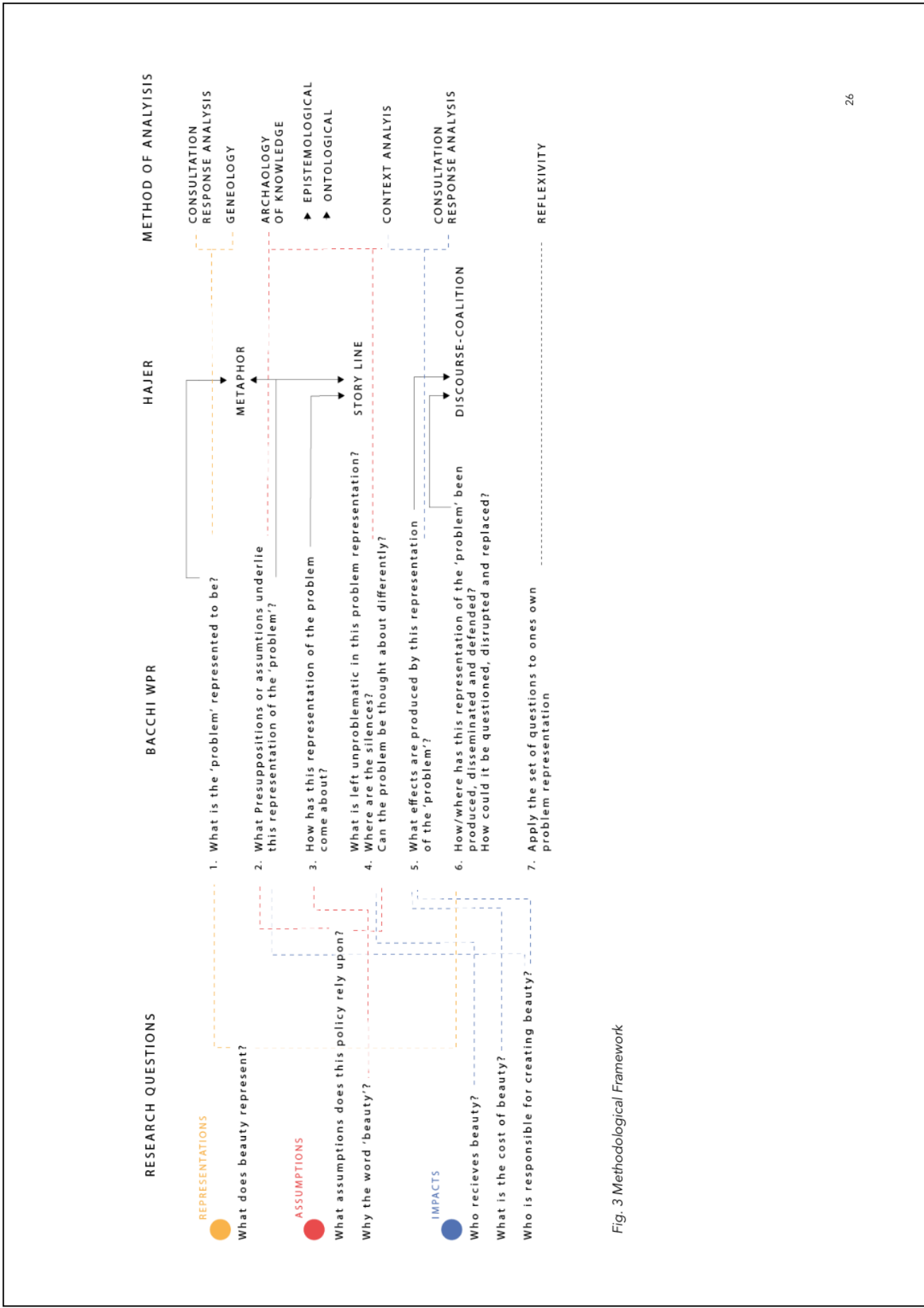
RESEARCH QUESTIONS

BACCHI WPR

HAJER

METHOD OF ANALYSIS

REPRESENTATIONS

What does beauty represent?

ASSUMPTIONS

What assumptions does this policy rely upon?

Why the word 'beauty'?

IMPACTS

Who recieves beauty?

What is the cost of beauty?

Who is responsible for creating beauty?

1. What is the 'problem' represented to be?

2. What Presuppositions or assumtions underlie this representation of the 'problem'?

3. How has this representation of the problem come about?

4. What is left unproblematic in this problem representation?
Where are the silences?
Can the problem be thought about differently?

5. What effects are produced by this representation of the 'problem'?

6. How/where has this representation of the 'problem' been produced, disseminated and defended?
How could it be questioned, disrupted and replaced?

7. Apply the set of questions to ones own problem representation

METAPHOR

STORY LINE

DISCOURSE-COALITION

CONSULTATION RESPONSE ANALYSIS

GENEOLOGY

ARCHAOLOGY OF KNOWLEDGE
▲ EPISTEMOLOGICAL
▲ ONTOLOGICAL

CONTEXT ANALYIS

CONSULTATION RESPONSE ANALYSIS

REFLEXIVITY

Fig. 3 Methodological Framework

3.3 DATA SOURCES

The framework outlined above has been applied to two sets of data sources. The first being the policy text and the documents involved in the formulation of the policy, and the second being a collection of the consultation responses to the policy reform, published independently online. The integration of both sources and multiple perspectives have complementary aims within the research. The analysis of the government policy texts aims to identify "conceptual logics" (Bacchi, 2009:252) that allow particular meanings to be made to uncover hegemonic understandings of policy issues. The analysis of consultation responses allows for exploration of the relationship between policy and the interpretations of a range of stakeholders who are situated differently in relation to the official texts.

Policy Documents and reports

As Identified within the literature review and figures 2 and 3., The NPPF holds significant power within the planning system. Beauty has been introduced within the social objectives of the NPPF and Chapter 12 titled *Achieving Well-Designed Places*. An analysis of the genealogy of the most recent reforms to the NPPF demonstrates how the inception of beauty has been developed through a number of stages from the informing BBBBC, to the *Planning for the Future* White paper, surmounting a concrete establishment of beauty within the 2021 NPPF fig. 4. As such, these documents act as the main sources of policy text for analysis with a specific focus on Chapter 12 of the resulting 2021 NPPF.

Consultation responses

An analysis of consultation responses enables an exploration of different perspectives of policy actors and the way in which they present themselves within the policy process. These perspectives are likely to be expressed through different forms of language, highlighting how they interact within particular policy contexts (Ockwell and Rydin, 2010)

Throughout planning policy formulation, several consultative steps are taken with the aim of implementing a democratic system. As such, the data used within this paper looks to the consultation responses from the changes to the 2021 NPPF and NMDC, as well as the responses to the *Planning for The future* White Paper (2021), which have been made public by individual institutions and organisations online. Appendix A expands on content from the consultation responses which referred to the introduction of beauty, highlighting quotes relating to the discourse of aesthetic control and beauty.

Using secondary data such as this allowed for a wider sample of responses all of which had answered identical questions based on the same document. Responses for both the NPPF and the White Paper have

been included to widen the sample number and obtain a holistic opinion on the final changes to the policy in terms of the introduction of beauty.

Extracts were taken from the responses by reading and re-reading the texts to identify opinions which related to the discourse of beauty. This involved specifically looking at Question 8 of the NPPF consultation which focused specifically on the use of the word beauty, asking "Do you agree with the changes proposed in Chapter 12 'Achieving well-designed places'?" and question 20 of the white paper consultation "Do you agree with our proposals for implementing a fast-track for beauty?". The response documents were then read thoroughly to identify where these views were further reflected throughout responses to the remaining questions within the consultation. A summary of the issues raised by respondents has been included within the table in Appendix A.

The point of including multiple stakeholders views within this step is an acknowledgement that "language is not just a medium of interaction but is also constitutive of actors, their identities and their values" (Ockwell and Rydin 2010). As such, the values of policy actors' are conceived through discussions and communications of those values (DeLuca, 1999) which can be found within their written responses to the policy documents.
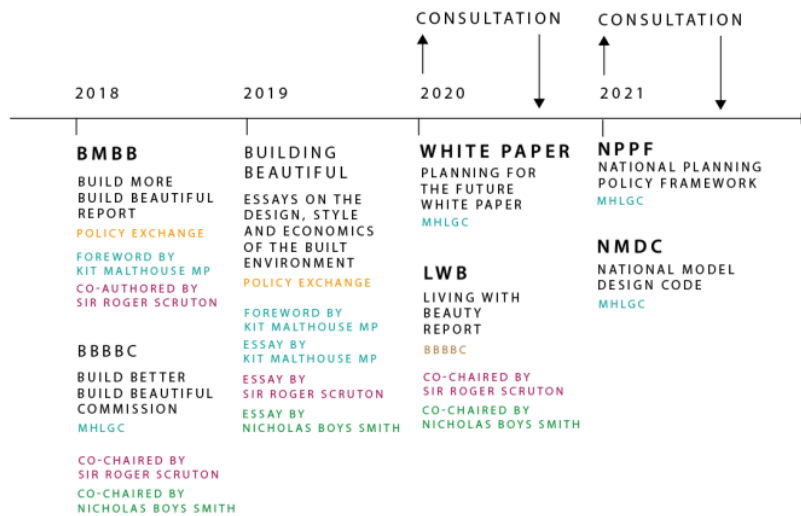
Fig. 4 Genealogy of 'beauty' in NPPF - Documents highlighted in bold used during analysis

3.4 METHODOLOGICAL LIMITATIONS

The first limitation of the methodology within this paper is one of scope. Whilst Bacchi's methodology provides an in-depth approach to analysis, within the breadth of this paper, there are issues which could not

be explored in-depth. For example, the large amount of media representation of the topic as well as online panels and debates which have taken place over this policy reform, provide further interesting insights into public opinion which this paper has not had the length to address in full. Therefore, I propose that this analysis be considered preliminary to further research on some of the topics highlighted within the concluding chapter.

It should also be noted that the selection of consultation responses was limited by access and availability of documents. Whilst the government notes that there were 1,178 of consultation responses in total to the NPPF and NMDC consultation and approx 44,000[2] to the White Paper, many of those are not published online with the government yet to publish their response to the white paper consultation two years on. As such, the sample selection was purposive and determined based on including a range of public and private responses as well as responses from a variety of sectors (see Table 2). Responses from LAs and institutions representing the public voice were exhaustively searched for with only those who had published publicly online and mentioned beauty, being included in the study. As such, it was not possible to generalise stakeholders' opinions on the topic, nor was the split between public and private responses equal.

3.5 ETHICS

In terms of ethics, the consultation responses were published online and made publicly available by individual organisations, identified and collected together through simple online search. The same can be said for the policy documents which are openly published online by the government. The consultations were also only used from organisations and professional bodies which meant that there was no information relating to authors including addresses or personal data.

3.6 REFLEXIVITY

A common criticism of discourse analysis methodologies is that discourses do not just emerge from texts or make themselves self-evident, rather they are constructed by the analyst themselves. As such, research choices and the discourses proposed are subjective in nature (Ockwell and Rydin, 2010). Within the analysis process, a number of different themes were considered and a number of discourses emerged causing the focus of the analysis to be constantly in flux. The final themes which this paper focuses on can be justified by their relevance to the hypothesis and research question, however this does not detract from the fact that certain discourses are not discussed.

This paper looks at beauty in policy from a specific urban planning perspective. As such the discourses raised within this analysis are a reflection of issues which arise within planning knowledges such as social, political and economic discourses. As the researcher, with a background in design, studying planning and working in

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[2]Mentioned within parliamentary questions - Access via: https://questions-statements.parliament.uk/written-questions/detail/2021-05-27/8631

architecture, my interests lie at the intersection between design and planning and the role of planning as a method of aesthetic control. Beauty within policy, however may be approached from a number of different perspectives. For example, whilst the following analysis touches upon some economic discussions, these are not the primary focus; instead the research has specifically looked to socio-political discourses and their impact on social justice within an urban context.

It should also be acknowledged that much of the theoretical framework which underpins this analysis is Eurocentric in its approach to both beauty and justice. Beauty within Asian cultures for example is defined and theorised from a very different perspective to that of the philosophies which derive from Aristotle, such as Hume and Kant, and thus, an analysis from an Asian centric standpoint would determine a very different set of discourses. The same can be said for theories and ideologies concerning justice.

4.0 ANALYSIS

4.1 REPRESENTATIONS

4.1.1 INITIAL FINDINGS

The government publicly released a summary of the responses to the 2021 NPPF and NMDC consultation as well as responding themselves to those replies. In response to question 8. "Do you agree with the changes proposed in Chapter 12 'Achieving well-designed places?'", they reported:

"A total of 578 respondents answered yes/no to this question. Of those, 403 (70%) said they did agree with the changes proposed in Chapter 12, 175 (30%) said they did not." (MHCLG, 2021f)

With specific reference to comments on beauty, they reported:

"Many welcomed the greater encouragement for high quality design in the proposed changes. However, respondents also questioned the use of the term "beautiful"' in the Framework as they felt it is too subjective, and that it would help to provide a definition." (MHCLG, 2021f)

In response to this, the government concluded that:

"On the use of the term "beautiful", this has been included in the Framework in response to the recommendations of the Building Better, Building Beautiful Commission. This should be read as a high-level statement of ambition rather than a policy test. The government would encourage local planning authorities, communities and developers to work together to decide what beautiful homes, buildings and places should look like in their area. This should be reflected in local plans, neighbourhood plans, design guides and codes, taking into account government guidance on design." (MHCLG, 2021f)

From the analysis and summary of the consultation responses, it became evident that the government's summary of responses to the inclusion of beauty was limited and did not cover many of the points raised regarding beauty by respondents. The findings and summary of actors' view points have been drawn out in Table 2. This has been used throughout the subsequent analysis with quotes identified within Appendix A used to support arguments throughout.

Planning	4	• Lack of definition of beauty • Lack of connection between promoting beauty and social and functional agendas of planning • Considers beauty to be connected purely to aesthetics • PD rights at odd with promoting good design • Integrate beauty with climate and sustainability implications
Public voice	3	• Lack of consistency with the BBBBC report • Beauty is too subjective • Design Codes rely on consensus • Codes likely to create inequality • Lack of resources in LAs to implement design codes •
Environmental	3	• PD rights at odd with promoting good design • Preservation of natural beauty should be prioritised over growth and housing targets. • Connection between beauty and social welfare benefits • Lack of definition of beauty • Beauty should include social and environmental aspects • Integrate beauty with climate and sustainability implications
Urban Design	2	• General encouragement of the use of beauty • Beauty to be integrated within all chapters for consistency • Difference between extent experience and lived experience • Regional inequality of beauty in development • Raises question of social Justice
Local Authority	10	• Lack of definition of beauty • Beauty is too subjective • Other factors are of greater importance (Climate + sustainability) • Considers beauty to be connected purely to aesthetics through architectural styles • PD rights at odd with promoting good design • Integrate beauty with climate and sustainability implications • Lack of criteria for measuring beauty • Car usage needs to be reduced in order to obtain urban beauty • No criticism of the use of beauty • Ensure that design codes are area specific • Beauty should consider more than aesthetics • Fast Track does not lead to Beauty
Housing	1	• Function will follow form • Fast Track does not lead to Beauty
Sustainability	1	• Lack of definition of beauty • Lack of connection between beauty and social value • PD rights at odds with good design
Developer	2	• Welcomes clear codes and principles • Principles should refrain from determining styles and attributes • No specific mention of Beauty • Lack of resources in LAs to implement design codes • Notion of expert in design
Law	1	• Lack of definition of beauty • Beauty is too subjective • Lack of distinction between visual aspects and functional aspects • Lack of criteria for measuring beauty
Conservation	1	• Lack of definition of beauty • PD rights at odd with promoting good design • Integrate beauty with climate and sustainability implications
Heritage	1	• Lack of definition of beauty. • PD rights at odds with promoting good design. • Beauty is only apparent in one chapter when it impacts a variety of chapters including town centres and communication. • Better connections to be made between the NMDC, NDG and NPPF to identify the difference between attractive and beautiful.
Transport	1	• Beauty should not be priority • Lack of consistency between car parks and beauty • Pursuing beauty can increase costs

| Retail | 1 | • No criticism of the use of beauty
• Concern over inclusivity within the creation of design codes |

Table 2. Summary of responses from consultation, see full list in appendix A

4.1.2 WHAT DOES BEAUTY REPRESENT?

"If policies, arguments, analyses and prescriptions purport to provide answers, they do so only in relation to a set of questions. Their very status as answers is dependent upon the existence of such a question." Nikolas Rose (1999:58)

The goal of Bacchi's first question, 'What's the 'problem' represented to be?' is to identify what the problem underlying a policy or recommendation is represented to be instead of addressing the problem that is assumed to already exist (Bacchi, 2009). Within the context of beauty in planning policy, it could be assumed that the introduction of beauty is the answer to ugliness or not enough beauty within the urban environment. Bacchi, however, encourages the researcher to delve deeper and identify the implied problem being targeted by analysing the active recommendations within the policy, allowing one to establish a starting point for interrogation.

Therefore, the following discourse analysis begins with Chapter 12 of the NPPF and its goal of achieving 'Well-Designed Places', where the policy explicitly states that, "The creation of high quality, *beautiful* and sustainable buildings and places is fundamental to what the planning and development process should achieve" (MHCLG, 2021:38 emphasis added). Hajer would describe this statement as a story line used as a "condensed statement summarising complex narratives" (Hajer, 2006:69). As such, one can acknowledge the word beautiful here is being used within a narrative which allows for alternative understandings of the problem representation. Placing the word beautiful into policy relies on an assumption that the reader has a preconceived knowledge of what beauty means, and so assumes that there is a mutual understanding of meaning. It is evident, however, from both the consultation responses and also the philosophies on beauty that the word evokes different meanings for different people.

The consultation responses demonstrate that many actors assume beauty to mean aesthetic qualities. Whilst there is no definition of beauty within the NPPF, it is placed within the social objectives in the opening of the document. The extension of the definition of beauty beyond aesthetics to social welfare can be mapped directly back to the definition of beauty by the BBBBC:

> *"Beauty includes 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. It is not merely a visual characteristic, but is revealed in the deep harmony between a*

place and those who settle there. So understood, beauty should be an essential condition for

planning permission" (BBBBC, 2020:1)

This definition suggests that introducing beauty into policy can resolve a wide range of problems which involve both people and place. A message which is evidently not interpreted in the same way by all readers.

A key point highlighted within the responses is the lack of cohesion between existing policies supporting the environment and climate change, and the introduction of design-based policies[3]. If, as the government stated, beauty is a social objective, used as a "high-level statement of ambition"(MHCLG, 2021f), then it should be applied across the board and incorporated into all policies. For example, Historic England noted the lack of changes made to Chapters 7, 10 and 17[4] which, under the broad definition of beauty given by the BBBBC, should be impacted by beauty.

The suggestion that the agenda for promoting beauty is not only for aesthetic or social benefit is also evident when analysing chapter 12 alongside the introduction of policies to restrict the use of Article 4 directions to remove national permitted development rights (PDR)[5]. As raised by a number of the consultation responses, this policy is completely at odds with the pursuit of beauty within the built environment. The government commissioned an enquiry into their impact which established that PDRs have led to poor quality housing from both an aesthetic and social perspective (Clifford et al., 2020). Therefore, by reducing their restrictions, the policy actively encourages poor quality design. Such a lack of consistency throughout the policies suggests a lack of integrity of achieving beauty as a social agenda.

Considering the changes made to NPPF within the context of the preliminary consultative White Paper, it becomes clear that the inclusion of beauty extends beyond wanting to achieve 'well-designed places' on a social and aesthetic scale highlighting a key agenda to create a "fast-track for beauty" (MHCLG, 2020), in order to increase housing supply. Such an agenda can be traced directly back to a 2018 report, *Building More Building Better,* by conservative political think tank Policy Exchange titled: *How design and style can unlock the housing crisis?,* which featured a foreword by the then Secretary of State for Housing, James Brokenshire. The report's aim was to demonstrate that, "people have a soft consensus over what is desirable, but that such a consensus is essential to new homes being built at the rate required." (Airey et. al, 2018:6). This growth agenda becomes increasingly evident within the White Paper which highlights the goal of achieving consensus on design in order to speed up development and housing supply. The consultative White Paper places "Planning for beautiful and sustainable places" as a secondary pillar between, "Planning

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[3] See Appendix A - specifically RTPI response

[4] Chapter 7 - Ensuring the vitality of town centres; Chapter 10. Supporting high quality communications; Chapter 17. Facilitating the sustainable use of minerals.

[5] 2021 NPPF Chapter 4 para 53- 54

for development" and "Planning for infrastructure and connected places" (MHCLG, 2020). The goal of the overall policy reform here is clearly stated as seeking:

"*A significantly simpler, faster and more predictable system*" (MHCLG, 2020:8)

Within this initial directive, there is no mention of beauty or design. Therefore, one can assume it to be a solution to a problem as opposed to an initial objective. This is supported through the appearance of beauty within a list of "national challenges":

"*The planning system is central to our most important national challenges: tackling head on the shortage of **beautiful**, high quality homes and places where people want to live and work; combating climate change; improving biodiversity; supporting sustainable growth in all parts of the country and rebalancing our economy; delivering opportunities for the construction sector, upon which millions of livelihoods depend; the ability of more people to own assets and have a stake in our society; and our capacity to house the homeless and provide security and dignity.*" (MHCLG, 2020:10 emphasis added)

This premises a multitude of problems, from biodiversity to homelessness, with the issue of a lack of beautiful homes. The listed sequence of the problems alludes to the shortage of beautiful homes being the most pressing challenge amongst a multitude of other social and environmental issues. If one then looks to the reforms which were subsequently introduced into the NPPF, it is clear that the resolution to the shortage of beautiful homes has been attempted to be resolved through the addition of the word beauty along with an introduction of local and national design codes (NMDC). Therefore, it can be understood that beauty and design codes are being used as the solution to perceived supply problem of a shortage of beautiful homes.

Bacchi suggests that it is crucial to consider what she describes as 'nesting' within uncovering problem representations. This is where the problem representation lies within a representation, causing us to ask multiple times, what the problem is being represented to be. If we consider beauty as a way to create a "faster more predictable system"(MHCLG, 2020:8), beauty becomes a solution, not only to a lack of supply of "beautiful, high quality homes"(MHCLG, 2020:10), but also to a lack of predictability within the system. Beauty can therefore be seen as a government incentive to create a form of certainty through consensus, to create a more predictable system in order to resolve housing supply issues.

4.2 ASSUMPTIONS

4.2.1 WHAT ASSUMPTIONS DOES THE POLICY REPLY UPON?

Bacchi poses the question of what meanings needed to be in place for a policy to emerge? This draws on Foucauldian theories of archaeology to uncover epistemological and ontological assumptions concealed within the formation of policy, asking us to undertake an analysis of discourses within the text. Doty (1993) summarises this by shifting the question of why something happens, to how it is possible for something to happen - what meanings need to be in place for it to happen? Therefore, this section is broken down into assumptions which are apparent within the problem representation of beauty as the solution to unpredictable housing supply, unpicking them to disclose forms of governmentality and power-knowledge.

Assumption 1: Beauty is an objective social good

From the initial analysis of the problem representation, the introduction of beauty within the policy can be seen as founded on the understanding that beauty is objective and thus can create consensus, improving predictability. Such an understanding of object beauty can be traced back and is evident within the theoretical works of Scruton, thus the BBBBC, as well as within the original Build More Build Beautiful report.

The Living with beauty report included a quote:

> 'Today to talk of beauty in policy circles risks embarrassment: it is felt both to be too vague a word, lacking precision and focus and, paradoxically given its appeal by contrast with official jargon, elitist. Yet in losing the word 'beauty' we have lost something special from our ability to shape our present and our future.' (Fiona Reynolds 2016, within BBBBC, 2020:vi)

Perspectives such as Reynolds on the dominant aversion to beauty within politics can be traced back to Kant's philosophies of disinterest where he argues that aesthetic judgements cannot be proved by argument (Matilla 2002). Such an understanding is apparent within many of the consultation responses where concern was often raised regarding the individual subjectivity of beauty with some explicitly commenting that beauty was too subjective as it is "dependant on the eye of the beholder"[6]. Whilst the government responded to these comments with its justification of beauty being used as a framework, it should also have been made explicit within the policy text itself. It can be understood that by framing beauty as a social objective, the government is presenting beauty in a similar way to Habermas, as a moral value, arguing that beauty elicits a

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[6] See Appendix A, Richmond LA response

universal sense of good. Examining this within Foucauldian concepts of power knowledge, whereby we are governed through knowledges, the policy's attempt to objectify beauty becomes an act of power.

Whilst these theories can be used to argue for a universal *experience* of beauty, the *creation* of such beauty is not suggested to be within the hands of the many. This highlights a major discrepancy between the agenda for beauty as a social good in terms of universal experience and the formation of publicly informed design codes as suggested by the governments response to consultation[7]. This distinction is what Beardsley considers within his theory of Aesthetic Justice. He does not dispute that everyone should experience beauty, but the question remains as to who is responsible for producing it. The policy reform of the 2021 NPPF and introduction of the NMDC suggest that this is the responsibility of the public advocating the idea that individuals should have agency over the beauty which they will ultimately experience.

Assumption 2: *Participation leads to consensus*

By including the public in the creation of local codes to define beauty, there is also the suggestion that consensus is built through a participatory process. Rydin (2003) specifically considers creation of consensus through communication within the context of discourse analysis. She argues that, rooted in Habermasian theory, communication between actors as a process has the potential to create consensus, "where actors engage in communication with a performative stance towards mutual understanding" (Ockwell and Rydin 2010:171). One could identify the attempt of democratic methods within a participatory process of creating design codes as proposed by Healy. However, this apparent public inclusion does not utilise the benefits of spaces for discussion and conflicting ideas, crucial to the success of democratic participation (Habermas; Arendt; Mouffe, 2013). Placing the proposed local design codes within the context of Arendt's theories, the solidification of conflicting opinions into rigid design codes eradicates discussion and destroys spaces of appearance and public spheres.

This creates a system whereby citizens are tasked with defining a harmonious vision of beauty through a code which then becomes guidance for permitting and rejecting applications. As such, the amount of participation and rebuttal from the public within the decision making process itself is reduced. The consultation response from Civic Voice highlighted this as one of their main concerns. As a representative of multiple civic societies and community groups[8], they noted that, whilst the design codes to promote beauty involve public consultation, the involvement is a "relatively abstract and technical exercise dealing with principles and rules" (Appendix A, Civic Voice response). They added that local groups "prefer to comment on specific proposals as they arise, as is current practice"(ibid.) which is likely to be reduced in the introduction of design

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[7] See section 4.1.1 Initial findings

[8] Self described as the National charity for the civic movement in England

codes. As such it can be argued that the process would be less democratic in serving the preferences of the public.

Another issue associated with public participation is the insurance of inclusivity and representation in the process. Public participation within the formation of design codes is unlikely to include the views and perspectives of all residents within an area. One of the consultation responses published online, highlighted this probable exclusion:

> "The process of agreeing design codes impacting on commercial development will rely too heavily on local community involvement and give disproportionate weight to the views of residents who have little understanding of the retail market and a tendency to approach planning matters from a comparatively narrow viewpoint." (Appendix A, Accessible Retail response)

Despite specifically commenting on the design of retail spaces, as opposed to homes, this response highlights the issues raised by Kompridis (2014) and Mouffe (2013) in exclusion of the plurality of society through limited participation. As such, it demonstrates that without active, inclusive and perpetual spaces for discussion and agonism, the concept of beauty and aesthetics cannot be seen as just, as a fair consensus amongst *all* citizens will never be achieved.

This brings rise to further issues of democratic social justice outlined by Fainstein. Within her criteria, she highlights "the existing population however should not be the sole arbiter of the future of an area"[9]. This acknowledges the dynamic nature of cities and the fact that those who are local to an area at one point in time will not always represent the local residents of the future. Within the context of the policy reform, creating local codes takes time. By defining beauty within a set of views, established at a given time, does not allow for perspectives to reflect changing populations within an area over time. Considering this alongside theories on the public sphere and 'spaces of appearance', the critical perpetual nature of these democratic spaces is lost and as such the democratic element of participation is diminished.

Assumption 3: *Beauty is not elitist*

There is also the presupposition that the public, local to the environment, are the best determinants of what is beautiful in that environment. This is argued through the definition of beauty as being something which responds positively to its local surroundings and context (MHCLG 2021f; BBBBC 2020). This, however, relies on the assumption that beauty holds the same meaning for all agents which the consultation responses demonstrate is not the case.

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[9] See Table 1.

This raises questions surrounding existing determinants and agents of beauty and aesthetics in the built environment, as well as issues which arise with handling multiple knowledges (Petts and Brooks, 2006; Ockwell and Rydin, 2010). Ockwell and Rydin express this issue, acknowledging that, "engaging different knowledges is fundamentally different to engaging different voices" (2010:56). This highlights limits to collaboration, especially between public and experts, where knowledges of issues are likely to vary greatly and be conceived from different experiences.

Experts on design and beauty within the built environment are often considered to be architects. Franklin notes that dating back to the 5th Century BC, architects have ventured to discover the principles of buildings and their form which create beauty, aesthetics and harmony (Franklin 2001:85). Within architectural theory, the aesthetic success of buildings is derived from their "size, scale, proportion, massing and volume, relationships of parts to each other and to the whole, ornamentation, rhythm, light and shadow, texture, decoration and colour" (Ibid). These are the same qualities which the NMDC, attempt to control through planning regulation and local design codes created by local citizens. By introducing design codes, the control over aesthetics gets passed into the hand of the participating public, opening up a dispute of knowledges.

Issues of training and education in aesthetics within LAs was raised within consultation responses with one developer pointing out:

> "*if local authority planning departments are not provided with the requisite design skills to play their full part in the production of local codes, decisions could increasingly be made on a rigid basis with strict adherence to a code or policies that ultimately diminish the involvement of design experts*" (Appendix A, BPF)

Public Practice, in their response to the White Paper, included results from a survey which demonstrated that out of 55 planning officers, none felt they had the skills or capacity to deliver the reforms set out within the White Paper. Within this, they noted that the number one resource lacking was skills in "Architecture and Design" (Public Practice, 2020: 5). Whilst BPF's response suggests a concern that the public are not qualified to formulate local codes and that experts would not play a role, Public Practice highlight LA's acknowledgement that they would require experts, but currently lack the resources to produce the codes.

Therefore, whilst local stakeholders play an important role in providing experiential and location specific knowledge, which may otherwise be overlooked, "such experience is not of itself a sufficient condition for it to be knowledge" (Rydin 2007; see also Rip, 2003). Liberatore and Funtowicz (2003) also point out a key distinction between knowledge and expertise:

"Expertise is not found but made in the process of litigation, decision-making and public debate; at the same time, not all knowledge claims are to be treated as equal. Expertise has legitimacy when it is exercised in ways that make visible its contingent, negotiated character and other critical views are accepted." (2003:149)

This demonstrates that a lack of involvement by design experts would limit the knowledges apparent within the collaborative process of defining beauty. Thus a conception of expertise in beauty is unlikely to be achieved solely through public participation as suggested by the policy.

Assumption 4: *Codes are a fast-track*

It has been established that the consensus which the government aims to form, in production of local design codes to define beauty, contributes towards a goal of 'fast-track' development. Design codes subscribe to forms of deregulation through a shift from a discretionary system to a rules based system, and it can be argued that deregulation is unlikely to achieve faster or more beautiful results.

The White Paper makes it clear that it considers the existing discretionary planning system restrictive of housing supply, arguing that the case-by-case nature of the English planning system

"has the important consequences of increasing planning risk, pushing up the cost of capital for development and discouraging both innovation and the bringing forward of land for development." (MHGLC 2020:10-11)

The topic of the existing planning system and its impacts on housing supply and quality has been widely discussed with two distinct sides to the argument. One is that a discretionary system impedes supply due to the time taken to push an application through the system, and the other argues that the discretionary system is the purveyor of quality within the built environment. The former argument favours more zoning based approaches, whilst the latter argues that deregulation through zoning does not create increased supply, it just creates an increases poor quality housing (Carmona, 2020a;2020b).

The White Paper, supports their pursuit of devolved zoning by referring positively to the zoning systems in Japan and Germany and, alongside design codes, proposes three simple zones to replace local policy based plans (Carmona, 2020b). Carmona highlights some of the issues with zoning that have appeared within Japan's development over time. He argues that zoning without discretion and a lack of design reviews have led to a mismatch of development across the country which he describes as "visual chaos that is fascinating in a Blade Runner sort of way but which few would regard as beautiful, at least not in the sense implied by

the White Paper" (Carmona 2020b). Germany's system of design codes is often considered exemplar and used to justify the introduction of design codes in England (Stille, 2007). However, Stille points out that many of the B-Plans result in "monotonous, land hungry developments of single-family homes that are unsustainable in terms of access, mix of tenure and use"(2007:26). Under the social objectives of the NPPF and the definition of beauty within the BBBBC, this is not the type of development which would align with a pursuit of beauty. The success of a B-plan relies on what Stille describes as an "enlightened local authority and good designers to prepare it." (Ibid). This refers back to the discussion of knowledges and the need for expertise, placing the argument specifically within the context of design codes. Therefore, it can be demonstrated that design codes as methods of deregulation are unlikely to bring about a 'fast-track to beauty'.

4.2.2 WHY THE WORD 'BEAUTY'?

Policies supporting devolution and deregulation are emblematic of neoliberal governmentalities outlined within the literature review. Other modes of governance are also evident within the policy which can be understood as underlying discourses within which beauty can be seen as a discursive tool to elicit affective and homogenous responses.

Affective governance

As noted by many of the theorists on beauty and aesthetics, beauty is highly emotive, as highlighted by Scarry's ethereal descriptions of beauty. Clough's (2007;2008) works on the affective turn in governmentality can be used to understand the use of beauty as a discursive tool within policy and its impact on the subject and their emotions. Affects are a way of theorising about the social forces that we encounter that might trigger the body to respond in a certain way (Massumi, 2015). Massumi (2002; 2015), looked at this by suggesting that affect precedes emotional states - it is not a feeling, it is an unconscious experience of intensity that cannot be fully realised in the understanding of language.

Coleman and Moreno Figueroa (2010) looked to the concept of beauty and affect theory through a feminist lens. Despite being used within a different context, their work is useful in analysing beauty's position within forms of governmentality. They draw on Clough's (2007) theories of affect, forming an understanding of beauty as *hope*: 'an embodied affective process or inclination' (Coleman and Moreno Figueroa, 2010:360). Looking to Clough's theories, it could be argued that the use of the word beauty, therefore, evokes an emotional response which consequently impacts individuals' behaviour. Thompson (2009) has considered this interaction between beauty and affect theory, noting that, "asking participants to create something they understand to be beautiful engages them in a quest that has powerful and potentially

positive results." He uses this to argue for beauty to be used as a force of good within performance art, however, his theories highlight the emotive responses to beauty and how this can be analysed from a political and governance perspective, arguing that, "beauty's power to disturb is crucial and has important, rarely acknowledged, political power" (Thompson, 2009:140).

Within the context of beauty within the NPPF, the consultation responses highlighted an understanding that beauty holds different meanings for all, a solution for which, a glossary definition was proposed multiple times. Whilst a definition may allow for better practical application of the policy, it does not diminish the emotive impact of the word beauty and the moral good associated within it. It can therefore be argued that beauty can be used as a discursive device for affect, whereby the word evokes an individualistic bodily reaction which is objectively associated with positive emotions.

Populist rhetoric

The assumption that beauty is not elitist, illustrated above, can be theoretically associated with populist rhetoric. This argument does not aim to prove that the politics of this government is inherently populist; instead, it aims to demonstrate how beauty can be used as a device which appeals to the many as opposed to a select few.

Populist rhetoric is often used by politicians to claim a direct relationship with "the people", presenting themselves as the "voice of the people" (Mudde and Kaltwasser, 2017). Canovan (2004) noted that the language used by populists is often "colourful and undiplomatic" in order to distinguish themselves from the governing elite and relate to 'the people'. An obvious and relatable example of populist rhetoric is the former president of the United States, Donald Trump and his use of the word 'beautiful'. It has been noted that he used the word on 35 occasions in one month to describe issues ranging from airports to citizens of Cuba (Cillizza, 2018). Whilst the exact reasoning for his choice of wording is not within the scope of this paper, it can be acknowledged that Trump's populist agendas were aimed at appealing to the people. It could therefore be argued that the word beautiful, because of its universal association with a positive experience, is used as a tool to incite consensus and agreement. Whilst it may seem extreme to compare the use of beauty in planning policy to the populist politics of Donald Trump - it demonstrates how the use of the word beautiful can be used within a political context to gain a sense of consensus - a goal established within the White Paper.

Populist methods of communication utilise notions of truth and common sense. Linking this to the use of the word beauty, paralleled with Scruton's understanding of beauty as truth, one can begin to establish the term as a political device.

4.3 IMPACT

Bacchi encourages the analyst to consider different forms of interconnected effects (Bacchi 2009:48): discursive effects, subjectification effects and lived effects in order to interpret the political implications of the policy in question. Discursive effects are the impacts formed from limits imposed on what can be thought and said. This has been explored within the previous section, highlighting how discourses could form certain understandings and assumptions through knowledges and governmentalities.

Subjectification effects refer to the way in which the policy establishes subject positions within discourse (Bacchi, 2009:16). It recognises that policy discourses and governmentalities can establish certain types of social relationships and affects the way individuals feel about themselves and others (ibid.).Whilst this was touched upon within the previous section, the following analysis places those findings within a social justice context where subjectification concentrates on the way in which the creation of subject positions can stigmatise certain groups within society (Bacchi 2009:42).

Lived and subjectification effects are directly correlated as lived effects consider the impacts of discourses on "how people live their lives on a day-to-day basis" (Bacchi 2009:43). This aspect is crucial and unique to the WPR approach as a form of discourse analysis. It assumes "there are real bodies and real people living the effects of discursive conventions" (Bacchi 1999:46). Within this thesis, it allows one to consider the direct impacts and consequences of an agenda for beauty and local design codes on people, and thus consider issues of social justice by relating these questions to Fainstein's criteria for a 'just city'.

4.3.1 WHO RECEIVES BEAUTY?

This paper established that beauty within the city is often considered as the external vernacular of buildings in harmony with each other. However it is important to understand that these buildings are not only experienced by the public as observers but also by the people who live within the buildings. A key shortfall of the reform to planning policy is a lack of reform to housing standards and building regulations in line with this pursuit for beauty from the government. Whilst building regulations are outside of the scope of planning, the lack of change to them becomes an issue of equity when considering policy as political and beauty as a lived experience.

An example of this can be witnessed within the development of social housing. Whilst the production of social housing works under the same regulatory planning framework as a private development, there are contextual differences (Goodchild 2021:20). Homes England is the existing regulatory agency for social housing, monitoring the quality of schemes and development within the sector. They themselves however do

not currently lay down specific design requirements or aesthetic regulations. The quality of social housing is assessed via a set of Housing quality indicator assessments. These assessments are used to ensure quality within the production of social housing along with the 2006 Decent Housing standards. Nowhere within either of these regulations does an agenda for beauty appear, instead the focus is on decency. The divide between decency and beauty as goals is clear within the choice of language, forming a divide between the internal lived experience of beauty and the external public experience, setting a lower set of internal standards for housing to adhere to a minimum of decency.

Within Shelter's response to the White Paper, they highlight the potential issues imposed on social housing from the pursuing beauty within policy, suggesting that it encourages function to follow form, thus connecting the outcome of such policy to Kant's theories of aesthetic disinterest:

> "Where the need for different tenures and types homes varies by locality, it's hard to see from the white paper how this will be accounted for in generalised and codified design standards. The risk is that function will follow form, rather than form following function." (Shelter, 2020:26)

This demonstrates further issues with the distribution of supply through prioritising beauty. It poses an important argument to consider whether the priority of policy is to ensure a functioning environment or a beautiful one. Whilst the documents leading up to the policy reform (see fig 4) would argue that those ambitions are one in the same, it has been demonstrated that deregulation via codes is unlikely to achieve beauty and here Shelter argues that it won't bring equal distribution either.

4.3.2 WHAT IS THE COST OF BEAUTY?

The pursuit of beauty also opens up questions of displacement and gentrification due to increasing costs. As Goodchild (2021) points out, "Good design and high building standards are seldom cost-free". He argues that a crucial implication of such policy reform encourages private developers to increase their costs and thus increase the costs of housing. This argument also uncovers economic discourses of beauty within the built environment and the impacts which beauty may have on affordability.

Alongside the Living with Beauty Report, the BBBBC commissioned Knight Frank (2020) to carry out research on the impacts of the proposals on cost and value. This report ultimately focused on the cost and viability of beauty to developers as opposed to the impact on the public. Whilst it is assumed that increasing quality of developments will come with increasing costs to developers, as suggested by Goodchild (2021), Knight Frank demonstrated that these costs are offset by increasing land values. Such increasing land values are

likely to lead to displacement in the form of gentrification which can have negative impacts on less affluent communities.

Fainstein argued within her criteria for equity that, "Planners should take an active role in deliberative settings by pushing for more egalitarian solutions to direct away from ones which disproportionately benefit the well off"(see Table 1.). One can argue that the probable gentrification and displacement impacts of increasing beauty, does not support equity measures in ensuring that beauty is available to all. This is a topic which in itself deserves exploring in depth which this paper does not have the breadth for, however, it should be acknowledged as something lacking from the discussion within the White Paper in terms of inclusivity as pointed out by Shelter within their consultation response.

This overall lack of consideration for equity inclusivity alongside beauty within the White Paper and NPPF is summarised by the Landscape Institute within their response to the NPPF and NMDC:

> "The word 'inclusive' should be added to the description of well-designed places in paragraph 8(b), to ensure they are well-designed for **all** users" (Appendix A, Landscape institute response, emphasis added)

Not only are there costs and social implications associated with building beautifully, but also with implementing and formulating codes to define beauty. Public Practice estimated that the cost of adopting a design code for an area of approximately 1000 homes to be as high as £139,000 (2020:6). The White Paper proposed that, "The cost of operating the new planning system should be principally funded by the beneficiaries of planning gain" (2020:3). Whilst this places the cost onto developers and land owners as opposed to public tax payers, attempting to fund planning measures through growth is likely to increase regional inequalities. This issue was highlighted by Public Practice within their response to the White Paper pointing out:

> "Authorities in the South East already invest over three times more per person on planning than Authorities in the North West, West Midlands and North East. Yet it is Authorities in areas with lower land values and slower rates of growth that are most in need of proactive planning to help level up spatial inequalities, rebuild local economies and reshape markets." (Public Practice, 2020:4)

As such, areas without large scale applications or infrastructure levies to fund planning strategies will end up under-resourced, creating a spiralling divide in spatial inequality. Again this highlights issues of equity on a regional scale where the cost of production of codes is likely to disproportionally benefit some areas over others.

4.3.3 WHO IS RESPONSIBLE?

Understandings of governmentality have been useful in analysing how neoliberal governance can transfer responsibility to individuals where the expectation is of individual responsibility and self governance (Rose, 2000). It has been demonstrated that, through participatory processes and the dissolving of elitist understandings of beauty, individuals are given the responsibility to resolve issues themselves. Whilst within the existing system one may question the skill of the architect or the decision of the planner when determining a building's aesthetic value, the creation of publicly formed design codes shifts a proportion of that question to the people. As such, it makes it difficult for individuals to critique or question the design of their built environment as they become the purveyors of aesthetics within it.

This course of action can be analysed within Foucault's theories of the self and subjectification. He argued that technologies of the self are "operations on their own bodies and souls, thoughts, conduct, and ways of being" (Foucault, 1988:18) which individuals make to reach a "state of happiness, purity, wisdom, perfection or immortality" (ibid.). Whilst this can be viewed as liberation, Foucault also argues that this freedom remains conditioned and dictated through the context in which individuals operate (Hall, 1996). Applying subjectification to a neoliberal political context, Foucault argued that the neoliberal identity is the "entrepreneur of [the] self"(Foucault, 2010: 226). Being an entrepreneur of the self means being one's own 'capital… producer… [and] source of earnings' (ibid.). He noted that neoliberalism entails acquiring human capital, especially through education and training, where the ideal subject within a neoliberal narrative "will invest in themselves and their futures by acquiring the necessary levels of 'human capital' to succeed" (Houghton, 2019:621).

Considering this alongside the understood neoliberal approach to planning, a pattern emerges in which citizens and individuals can be seen as responsible for the beauty within their environment. This places the onus of the unpredictability of the housing supply on the public as individuals and asks those exact people to solve the problem themselves by forming more rigid design codes. A crucial element of Foucault's ideal neoliberal subject is the implication of an 'unideal' subject (Houghton, 2019:622). As such an individual who does not participate in the pursuit of beauty through creating local design codes could be seen as the 'other'. Therefore, the policy becomes an act of subjectification where an identity is formed of the ideal citizen who aims to make their city beautiful.

5.0 CONCLUSION

Whilst this thesis had a number of research questions, the main objective was to uncover socio-political discourses within the use of beauty within policy. The representations, assumptions and impacts uncovered within the analysis shed light on a number of conclusions. The question of 'What does beauty represent?', demonstrates that the introduction of the word beauty in policy extends beyond social objectives or aesthetic pursuits. Beauty has been used as a means to create predictability in order to resolve a lack of housing supply. Through the initial analysis of representations, the discrepancy between the definition of beauty provided within the NPPPF and the understanding of the consultation respondents becomes clear. Whilst the government responded by acknowledging some of the points raised, no changes were ultimately made to the use of beauty within the policy. This demonstrates an immediate stifling of democratic participation within the consultation process of policy formulation whilst also diluting the integrity of public consultations.

Through an analysis of the policy's epistemological and ontological presuppositions as well as its genealogy; four assumptions have been exposed which can be disputed to reveal underlying power dynamics and governmentalities. Applying Foucault's power-knowledge theory, by using the knowledge of beauty as an objective good, the policy attempts to assert a form of power in order to achieve consensus. This however ignores the idea that beauty remains subjective in its experience, as highlighted by the consultation responses. The attempt to create consensus through participation has also been disputed. As advocated by Young and Healy, participation should be utilised as a democratic tool in order to ensure that voices of citizens are heard and included. However by pursuing consensus, this ignores the heterogeneity of the public, the subjectivity of the experience of beauty, and the change of populations and perspectives over time. Applying Arendt and Habermas' theories of democratic spaces help demonstrate that, by solidifying a public opinion within rigid design codes, the attempt for democracy of participation becomes futile. Such public participation, as well as being undemocratic, is unlikely to achieve a definition of beauty through expertise. As highlighted by Liberatore and Funtowicz, not all knowledges are equal, and whilst public opinion provides value in location specific experience, knowledges of beauty and design from professional fields are also required in order to attempt to create expertise to define beauty within a local area.

The existing issues with LAs being able to formulate local design codes with current resources of knowledge was demonstrated through Public Practice's survey. They also raised the important point that the cost of bringing in such expertise is like to exacerbate regional inequalities. As such, questions of equity are raised within the process of defining beauty where outcomes and financial consequences have not been

appropriately considered. The same can also be said for the experience of beauty, whilst the policy aims to advocate beauty for the observer, it fails to consider the utility of houses as homes. The lack of changes to housing standards as well as a lack of consistency across all policies, so as to not prioritise external aesthetics, demonstrates a potential for unequal lived experience. This reintroduces a key issue with pursuing beauty in the built environment which Kant acknowledged through his concept of disinterested aesthetics. Buildings, whilst they may aesthetic to some, are not equal to art. Building serve a purpose and a function beyond observation and as such should be assessed on more that just beauty to avoid issues of beauty for beauty's sake.

The disputation of the above assumptions presents the question of 'why use the word beauty as an objective?'. This has been explored through discursive analysis of the word, showcasing it as a political device which evokes individual emotion through affect, whilst also uniting people through its populist rhetoric. As such, beauty can be positioned within political context of governmentalities and subjectification, whereby power is held within the language. By asking 'Who receives beauty?', 'What is the cost of beauty?' and 'Who is responsible for creating beauty?', it becomes evident that the impacts of the policy and power on people are unequal. By attempting to define and distribute beauty, inequalities are unsurfaced where, again the heterogeneity of the people and their experiences are ignored.

This thesis has demonstrated that planning and policy is intrinsically connected to politics (Auerbach, 2012), and that exploring the power dynamics within its forms of control through policy is crucial when assessing social justice. It has been demonstrated that beauty holds power within knowledge when being utilised as a market mechanism and holds discursive power within its use as a political device. Therefore, whilst beauty may be objective with the pursuit of it, the experience of beauty remains subjective. As such, any attempt to objectify beauty through policy becomes a miss-use of power which, in turn, creates subjects out of citizens and reduces the democracy and equity required for a 'just city'.

5.1 SCOPE FOR FURTHER RESEARCH

The reflexive element of this thesis was introduced in section 3.6. It should also be noted that this research took a wide approach to data collection, focusing on broad narratives as opposed to individual experiences which may have been obtained from more in-depth interviews. These perspectives would shine light on a number of varying discourses within policy in order to paint a clearer and better picture of the forces of power apparent within planning policy.

Therefore, I encourage others to follow a similar framework with a variety of data, applying their own personal analysis in order to uncover other underlying discourses and power relations within the policy.

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7.0 APPENDICIES

APPENDIX A

DATA - SELECTION OF CONSULTATION RESPONSE QUOTES

	DOCUMENT	ORGANISATION	INDUSTRY	SECTOR	QUOTES	KEY THEMES SUMMARY
1	NPPF + NMDC	Planning Officers Society	Planning	Private	"POS suggests the NPPF should **include a definition of 'beautiful' in the Glossary**. This would provide more clarity in terms of paragraph 8 (b) of the amended National Planning Policy Framework."	• Lack of definition of beauty
2	NPPF + NMDC	Royal Town Planning Institute (RTPI)	Planning	Professional Body	" **Permitted Development (PD) rights directly contradict beauty and design**. We recommend that all development be considered in a joined-up approach, not in isolated consultation papers and proposals" "We need an overarching framework for securing economic recovery post Covid-19, delivering housing numbers and building beautiful. **Action on carbon reduction should be the first** amongst equals in the planning process. "	• PD rights at odd with promoting good design • Integrate beauty with climate and sustainability implications
3	NPPF + NMDC	The Countryside Charity (CPRE)	Environment	Interest Group/ Voluntary organisation	"In direct contradiction to increasing the prominence of 'Beauty' in the planning system as the external appearance of a building cannot currently be controlled through the prior approval process governing relevant Permitted Development Rights (PDRs)" "Local planning authorities should be expected to **prioritise conserving and enhancing the natural beauty of an AONB over meeting and delivering on a Plan housing target**; housing developments in AONBs should primarily consist of affordable homes to meet local needs. Supporting guidance should also be produced on this issue." "The NMDC needs to make explicit reference to the role of developers in delivering a healthy food environment, with neighbourhoods where communities have the ability to buy, grow and cook healthy food."	• PD rights at odd with promoting good design • Preservation of natural beauty should be prioritised over growth and housing targets. • Connection between beauty and social welfare benefits
4	NPPF + NMDC	Wildlife and Countryside Link	Environment	Interest Group/ Voluntary organisation	"The inserted term **'beauty' must be clearly defined** in policy to recognise the importance of nature and sustainability to beauty, as suggested in the BBBBC's 'Living with Beauty' report" "**sustainability and health** are closely linked to beauty and placemaking" "beautiful places are also about **nature-rich accessible green spaces and green infrastructure and sustainable zero carbon development**" "Contrary to the Government's aim to integrate 'beauty' into the planning system and the design of developments, **permitted development rights frequently deliver poor-quality developments.**" The key point is that these **NPPF revisions fail to capture the above BBBBC recommendations** – showing in part how disparate the planning system is, and how the same issues linked to a lack of beauty and design in PDR will remain despite these generally positive changes to the NPPF "**A definition of beauty**, as inserted in paragraph 8(b) and elsewhere in the revised NPPF, is missing from the glossary. Beauty must be clearly defined in policy or associated planning guidance to recognise the **importance of nature and sustainability** to beauty, as suggested in the Building Better, Building Beautiful Commission's 'Living with Beauty' report."	• Lack of definition of beauty • Beauty should include social and environmental aspects • Integrate beauty with climate and sustainability implications • PD rights at odds with promoting good design

5	NPPF + NMDC	Historic England	Heritage	Professional Body	"The addition of "beautiful and sustainable" in Chapter 12, and the emphasis on good design and the benefits this brings to the historic environment are **positive.** Clear policy direction specifying the use of local design policies within plans accompanied by design guides and codes prepared by applicants or within supplementary planning documents would be supported." "The **definition of "beauty" in the NPPF Glossary** would also be of benefit". "The absence of changes to Chapter 6 Building A Strong, Competitive Economy, Chapter 7 Ensuring the Vitality Of Town Centres and Chapter 10 Supporting High Quality Communications is noted. Design and the notion of beauty and sustainability is relevant to policies within these chapters." "**Article 4 Directions.** Alongside expanded permitted development rights, the proposals risk negative and disproportionate impacts upon heritage. This is contrary to the wider heritage and design objectives in the NPPF, as well as having the potential to undermine the aspirations of the BBBB Commission's "Living with Beauty" report." "It would be useful for the NDG and NMDC to be referenced in clause b) to **clarify the notion of "attractive" pedestrian and cycle routes and how this differs from the term "beautiful" used elsewhere in the NPPF"** "Historic England supports the addition of "beautiful and sustainable" to paragraph 125"	• Lack of definition of beauty. • PD rights at odds with promoting good design. • Beauty is only apparent in one chapter when it impacts a variety of chapters including town centres and communication. • Better connections to be made between the NMDC,NDG and NPPF to identify the difference between attractive and beautiful.
6	NMDC	ARBI	Development	Developer	"**should avoid becoming overly concerned with style.** The question of style should be answered through consultation between developers, local communities and local authorities, and we believe a focus on this within the NMDC would dilute its usefulness as a guidance document for good principles that form the foundations of good design."	• No specific mention of beauty • Welcomes clear codes and principles • Principles should refrain from determining styles and attributes
7	NPPF + NMDC	BPF	Development	Developer	"design should not be overly prescriptive but rather a process **undertaken by qualified and experienced professionals (from both the private and public sector) with support from key local stakeholders.** An unintended consequence of any process that sets design criteria that is too rigid could be to stifle creativity and innovation. Further, if local authority planning departments are not provided with the requisite design skills to play their full part in the production of local codes, decisions could increasingly be made on a rigid basis with strict adherence to a code or policies that ultimately diminish the involvement of design experts"	• No specific mention of Beauty • Lack of resources in LAs to implement design codes • Notion of expert in design
8	White Paper	Civic Voice	Public Opinion	Interest Group/ Voluntary organisation	"Civic Voice support the greater focus on delivering high quality design in the planning system through design guides and codes, but design and community engagement needs to be considered in the context of the wider reforms to the planning system" "Further widening of permitted development rights together with this specific proposal on Article 4 directions seems to be at odds with the Government's aim to raise design quality and increase the importance of 'beauty' in the planning process as well as the aims for 'best in class' community engagement." "our membership questions the capacity of local planning authorities to deliver all of this, as well as implement planning reforms, and achieve 'best in class' community engagement. At the same time, our members recognise that some local authorities are barriers to progressing this wider agenda and a huge cultural change is urgently needed"	• PD rights at odds with promoting good design. • Lack of resources in LAs to implement design codes

9	NPPF + NMDC	Richmond Council	LA	Public	"We **do not concur with the addition of the word "beautiful"** in paragraph 8(b), particularly as this in the context of "**a social objective**"" "**. Beauty is highly subjective and in the eye of the beholder.** The introduction of the concept of "beautiful" places and homes into national planning policy is therefore questionable, particularly as the revised NPPF does **not attempt to define** what is exactly meant by the term "beautiful" for policy purposes. It is noted that there is still a subjective assertion of what 'beauty' is in the Building Better Building Beautiful Commission's (BBBBC), Living with Beauty, report" "we do not agree with the addition of the word "beautiful" in paragraph 73(c). The Council welcomes the focus on the quality of places to be created, as well as linking it with masterplans and design codes to secure well designed homes. As already mentioned in response to Chapter 2, we are concerned about the **overuse of the word "beautiful"**, especially as there is a lack of definition of what is exactly meant by "beautiful" in the NPPF. The **focus of the NPPF should be on good urban design and place-making, ensuring homes are accessible, functional, practical, meet space standards and can adapt to the changing climate.** What is considered beautiful can be highly subjective and dependant on the eye of the beholder; and new development and **architectural styles do not always appeal to everyone** on all levels at the time they are proposed. Contemporary and non-traditional design may be interpreted by some as poor design whilst "traditional" or pastiche designs may not be seen by others as authentic in their function, use or detail. **Instead of overemphasising "beautiful" homes, the NPPF should make it clear that well designed homes need to be built as low-carbon, to be energy and water efficient as well as climate resilient. In the context of a Climate Emergency this is of utmost importance.**"	• Lack of definition of beauty • Beauty is too subjective • Other factors are of greater importance (Climate + sustainability) • Considers beauty to be connected purely to aesthetics through architectural styles
10	NPPF + NMDC	Open Spaces Society	Conservation	Interest Group/ Voluntary organisation	"There should be a **clear definition of 'beauty'** to reflect the aims of the 25 Year Environment Plan 'to protect and enhance our natural built and historic environment'" "**Permitted development right (PDR) developments are not required to adhere to open space or green infrastructure strategies and they deliver poor-quality development which does not fit with the government's aim to integrate 'beauty'** into planning" "We welcome the changes, which reinforce the need to provide beautiful and sustainable places through the planning system. These changes are vital to ensure that local green space is created and protected," "**A definition of 'beauty' should be included in the glossary** to ensure that its meaning is clear and it enables the provision of attractive and energising places where people can live and work"	• Lack of definition of beauty • PD rights at odd with promoting good design • Integrate beauty with climate and sustainability implications

11	NPPF + NMDC	Local Government Association	LA	national membership body	"Whilst we support an increased focus on design, we are concerned that because **'beauty' is subjective, striving for, or allowing 'beautiful' development to be fast-tracked may not lead to the quality homes and places communities want and need.** Councils need tools that will empower them to create great quality homes and places and stop poor development, rather than supporting those deemed to be 'beautiful'." "We urge the Government to ensure there is **more consistency across the NPPF, and that it reflects other policy changes and/or legislative changes such as the forthcoming Environment Bill.**" "We do not support the proposal to restrict the use of Article 4 directions to remove national permitted development rights (PDR), as it undermines councils' ability to make locally-led planning decisions." "**Permitted development undermines the policies in the NPPF** and the intention of the NMDC to create sustainable, well-designed places. It can also fail to meet adequate design standards, avoid contributing to local areas, and create worse living environments."	• Lack of definition of beauty • PD rights at odd with promoting good design • Integrate beauty with climate and sustainability implications
12	NPPF + NMDC	Town and Country Planning Association (TCPA)	Planning	Professional Body	"The TCPA **supports the inclusion in Chapter 12 of the idea of 'beautiful homes and places'** as a national policy priority for the planning system. We recognise, however, that unlike equality where legal frameworks provide certainty on definitions, 'beauty' in the built environment will always be **a deeply contested concept.** While there is a greater cultural consensus about beauty in landscapes and the natural environment in the built environment 'beauty' is often represented by fundamentally opposed design traditions." "**Scruton's Building Better Building Beautiful Commission was much taken with John Ruskin's commitment to beauty. But Ruskin's commitment was founded on social justice and on the rejection of monotonous pattern book design.** So, while the emphasis on good design must be welcomed the risk is that **codifying what 'beauty' means will become a checklist rather than the starting point of creative design.** It is significant that this has been the fate of many previous attempts to codify good design from the 1919 Tudor Walters report onwards." "the NPPF should be amended to make clear whether the Government believes that the full implementation of the design code guidance equates to the achievement of 'beautiful design'. The NPPF should also make clear that while aesthetic **beauty in design is an important ideal it also needs to be balanced by basic issues of functionality.** This is particularly important in terms of **health and wellbeing and in response to the climate crisis.** Good design is about much more that about the acceptability or otherwise of particular housing design types."	• Lack of definition of beauty • Lack of connection between promoting beauty and social and functional agendas of planning • Considers beauty to be connected purely to aesthetics
13	NPPF + NMDC	Campaign for National Parks	Environment	Interest Group/ Voluntary organisation	"Allowing the **unrestricted use of permitted development rights will undermine the Government's ambition to deliver more beautiful places** as there will be very little opportunity to influence the design quality of new homes delivered this way." "**The guidance should place far more emphasis on mitigating and adapting to climate change in the process of creating beautiful places** and the role that the natural environment can play in helping deliver this. Zero emission design and climate adaptation should be integral to all new development."	• PD rights at odd with promoting good design • Integrate beauty with climate and sustainability implications

14	NPPF + NMDC	UKGBC	Sustainability	Interest Group/ Voluntary organisation	"In addition, alongside references to beauty, we believe the social objective (8b) should include an explicit reference to the concept of social value, and the Public Services (Social Value) Act 2012." "We echo the concerns clearly raised by the Building Better Building Beautiful Commission about the quality of development delivered under PDR. Despite the use existing pattern books and standard specifications, **permitted development continues to deliver poor quality development across the built environment.**" "In addition, a concern raised by our members was that the **glossary also does not currently include a guiding definition of beauty**, despite the fact this has been added as a specific concept into the NPPF. We would recommend a definition derived from the work of the Building Better Building Beautiful Commission is added into the glossary, reflecting the full findings and recommendations in the final report"	• Lack of definition of beauty • Lack of connection between beauty and social value • PD rights at odds with good design
15	NPPF + NMDC	Westminster Council	LA	Public	"While Westminster City Council **supports the principle of 'beauty', the term itself is very subjective and provide huge scope for ambiguity** and we do not consider the insertion of the word into national policy helps with clarity. Paragraph 8 would be improved by instead referring to high quality design. Alternatively, **a definition of beauty** or how to assess it should be included." "As mentioned earlier in this consultation response, the use of the term **'beautiful' in Paragraph 25 is problematic as it is subjective and we do not support the principle of its inclusion in national policy.** However, we support efforts to hold developers to account to incorporate design features and materials that deliver the high quality developments they are granted permission for. This could help to avoid situations where developers make amendments to their schemes post-permission to downgrade the quality of materials."	• Lack of definition of beauty • Beauty is too subjective • Lack of criteria for measuring beauty
16	NPPF + NMDC	Law Society	Law	Professional Body	"As a general point, we would welcome **greater clarity and guidance on terms such as 'beautiful'** as this will allow for greater transparency in the planning process and enable decisions to be more effectively challenged when necessary in the public interest." "While Government has accepted the recommendation for a stronger focus on beauty in national planning policy, there is **no current definition of "beautiful". It could therefore be a "subjective"** test with no guidance available as to how the matter is to be approached. There may be support or clarification through the National Model Design Code which may assist with this. However, consideration may also be provided in consideration of whether **beauty is not just the visual aspect, but also, or alternatively, in the function that it provides.** So that if the purpose of the building is beautiful in how it achieves its purposes, but is not visually attractive, is this then to be considered beautiful? **What happens if the building is beautiful but does not serve its purpose or function well?** We would welcome guidance on the definition of "beautiful" for the purposes of this test, which would help planning practitioners and the public understand the nature of the test."	• Lack of definition of beauty • Beauty is too subjective • Lack of distinction between visual aspects and functional aspects • Lack of criteria for measuring beauty
17	NPPF + NMDC	Greater London Authority (GLA)	LA	Public	"Urban areas require a significant **reduction in car travel to deliver the healthy, beautiful places** the NPPF and National Model Design Code are promoting." "As reflected in the many images in both the report of the Building Better, Building Beautiful Commission and the National Model Design Code, cars do not add to beauty or health but detract from them. They also undermine another key policy in the NPPF - making effective use of land."	• Car usage needs to be reduced in order to obtain urban beauty

18	NPPF + NMDC	Southwark	LA	Public	"In Southwark's response to the Planning for the Future White Paper we highlighted some concerns around Design Codes which would reduce design to **a tick-box exercise, a pre-ordained urban pattern, an agreed palette of materials and a predefined lifestyle.** Given the unique characteristics of every place, its geography, topography and historic environment, there was concern around the application of a national level of design codes which are ill-suited to specific local characteristics. "	• No criticism of the use of beauty • Ensure that design codes are area specific
19	NPPF + NMDC	Accessible Retail	Retail	Interest Group/ Voluntary organisation	"We support the principle of requiring strategic policies to set out an overall strategy for the pattern, scale and design quality of places and the new overarching social objective of the planning system to include the fostering of "well-designed, beautiful and safe places', where previously it required 'a well-designed and safe' built environment. " "Our second concern is that the process of agreeing design codes impacting on commercial development will **rely too heavily on local community involvement and give disproportionate weight to the views of residents who have little understanding of the retail market and a tendency to approach planning matters from a comparatively narrow viewpoint.** "	• No criticism of the use of beauty • Concern over inclusivity within the creation of design codes
20	NPPF + NMDC	Landscape Institute	Urban Design	Professional Body	"We **strongly support these changes. The word 'inclusive' should be added** to the description of well-designed places in paragraph 8(b), to ensure they are well-designed for all users."	• General encouragement of the use of beauty • Beauty to be integrated within all chapters for consistency
21	NPPF + NMDC	Transport Planning Consultants (TPS)	Transport	Private	"In our view, there is **more emphasis on beautiful design than getting the basics right**. "Parking is still treated as vital to the success of a development, rather than sustainability and 'beauty'." "**"Beauty" can cost**, particularly features which require regular ongoing maintenance, such as planting as part of SUDS and street trees more generally. **The ability for authorities to secure the very best finish in terms of materials can not only be difficult in the face of strong push back from developers, particularly on grounds of viability, but also conflict with, for example, affordable housing levels.** "	• Beauty should not be priority • Lack of consistency between car parks and beauty • Pursuing beauty can increase costs

22	White Paper	Wandsworth Council	LA	Public	"What is considered **beautiful can be highly subjective**; new development and architectural styles do not always appeal to everyone on all levels. Contemporary and nontraditional design may be interpreted by some as poor design whilst traditional pastiche designs may not be seen as authentic in their function, use or detail." "The **principles of good placemaking need to be incorporated**, design guides and codes should cover much **more than visual and aesthetic elements**; creating places for people to live, focusing on how places interact and allow for people to connect, and generally providing good living environments should be a focus of design guides and codes, all of which should ultimately be considered to be intrinsic to 'beautiful' design. Guidance on producing successful design codes will be needed to ensure that these will not solely lead to pastiche and replicas of what currently exists. " "be part of the **consultation process and vote on 'popular' design**). Equally **'beauty' is in the eye of the beholder** – this is an area which is subjective whereas what constitutes good design can be identified through a series of objective assessments on the matters set out above. " ". We are aware that officers at MHCLG have emphasised since the publication of the consultation that 'beauty' means more than visual appearance and aesthetics; however, to avoid any confusion we would recommend **exchanging the term 'beauty' with 'exceptional-quality design'** or with another **less ambiguous** phrase that is not as subjective and open to interpretation. **Any fast track based on personal taste and opinion** will be inherently flawed and not supported."	• Beauty is too subjective • Beauty should consider more than aesthetics • Lack of criteria for measuring beauty • Integrate beauty with climate and sustainability implications
23	NPPF + NMDC, and l White Paper Committee Notes	Bromley Council	LA	Public	"It is very hard to see **how PDR can fit within this proposed system**. The Planning White Paper proposals would rely on a strong local plan-led approach to embed the concept of beauty in Local Plans, design codes, etc. PDR, as it currently stands, would completely undermine this carefully prepared local design principles and guidance, due to the light-touch prior approval process which does not allow detailed consideration of design and other issues."	• PD rights at odd with promoting good design
24	NPPF + NMDC	London Forum of amenity and civic societies	Public Opinion	Interest Group/ Voluntary organisation	"The Building Better Building Beautiful Commission was clear in their section 'Refuse Ugliness' that they were referring to individual buildings. Also, they wrote that "It is widely believed that we are building the wrong things, in the wrong places, and in defiance of what people want." The Commission recommended that "We should be advancing the cause of beauty on three scales, promoting beautiful buildings in beautiful places, where they are also beautifully placed."They explained "What people want is buildings that reflect the history, character and identity of their community and that belong in their surroundings: somewhere, not anywhere." They amplify that on pages 35 and 36 of their report and on page 38 to the use of design codes for modular building. **A more complete response to the Commission's proposals would improve the NPPF**"	• Lack of consistency with the BBBBC report
25	NPPF + NMDC	Havering Council	LA	Public	"good design is **not solely about aesthetics**. Beauty in buildings also **comes with time** and good quality buildings are not necessarily beautiful. Good quality, sustainable buildings should provide sufficient space for occupiers with enough daylight and amenity, reduce climate change emissions (in terms of construction materials and methods, and during occupation), reduce water use, contribute to urban greening and reducing flood risk, as well as contributing to place making and beauty."	• Integrate beauty with climate and sustainability implications

26	NPPF + NMDC	The Islington Society	Public Opinion	Interest Group/ Voluntary organisation	**Beauty is highly subjective To embody it in a Design Code relies upon consensus, implying adoption of a code that is likely to represent a lowest common denominator.** This will tend to produce Bland Designs that are less than beautiful. Creativity is required if a character that is satisfying is to be achieved. Innovation must not be stifled. We recommend that a policy should also be included that encourages innovation, creativity and contemporary design.	• Beauty is too subjective • Design Codes rely on consensus
27	White Paper	Bexley	LA	Public	"The consultation document does not adequately reflect this holistic understanding of what produces good places, instead it focuses on particular aspects of good design (particularly aesthetics and environmental sustainability) to the expense of other aspects (including achieving the appropriate mix of uses)" "Bexley Council agrees with the recommendation from the Building Better, Building Beautiful Commission that **Homes England should attach sufficient value to design as well as price**, and give greater weight to design quality in its work." "Whilst we welcome the emphasis on the beauty of places and achieving high quality design, the **Fast Track approach described will not achieve this goal particularly in the context of such a subjective issue.**"	• Fast Track does not lead to Beauty
28	White Paper	Design Council	Urban Design	Professional Body	"It really is a strong beauty and design White Paper. But there are a broader range of aspects that are really important to fix that I don't think come across strongly enough in this at this point of time." **"Creating attractive buildings and an immediately surrounding environment is only one aspect of good design** – how people actually use and value the development as a whole will provide the final judgement." "There's a lot of focus on public realm, building beautiful, **what it looks like on the outside. But what's it like for people?** I went through the paper, and I think I found that that people were referred to 42 times. And that was up to the end of the introduction, and then nothing, as opposed to beautiful, beautifully and beauty. And this is about **creating places for people and the quality of the place and the home that they live in. Inside, not just outside**" "**Ensure beauty is not skin deep** by focussing future design coding and the fast track for beauty on how our homes and neighbourhoods work and serve us, and not just how they look – with new home that provide internal quality, natural light, adaptable, fit for purpose space, comfortable temperature, access to green space, considering energy efficiency and achieving net zero targets, **with less emphasis on aesthetic appearance and character, which are shown not to be people's priorities.** " "overall pattern of development that is being driven by government policy, and which is c**reating great levels of inequality** and undue pressures on our core ecosystems. **The outcome of what is proposed even if the government's proposals achieve 'more beautiful' development, is that we will have well designed developments in unsustainable places**" "I think that 'design' in the White Paper is focused on beauty, and there is little acknowledgement that design can and should have a major part to play in addressing health and health inequalities. **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.**"	• Difference between extent experience and lived experience • Regional inequality of beauty in development • Raises question of social Justice
29	NPPF + NMDC	Hillingdon	LA	Public	"Whilst the Council is broadly supportive of the report and its recommendations, as currently proposed, the insertion of the term **'beautiful' into the NPPF would be without definition.** The Council would therefore propose that a more precise definition of the term is provided to provide clarity in decision-making."	• Lack of definition of beauty

30	White Paper	Shelter	Housing	Interest Group/ Voluntary organisation	"Where the need for different tenures and types homes varies by locality, it's hard to see from the white paper how this will be accounted for in generalised and codified design standards. The risk is that **function will follow form**, rather than form following function. The issue of how affordable housing should be integrated as part of mixed communities is also unaddressed. Furthermore, **a planning fast track based on national development management policies will not enable locally sensitive, needs based, design**. And given some of the issues we have identified with the infrastructure levy it would be highly problematic if the fast track allowed developments to circumvent the negotiation"	• Function will follow form • Fast Track does not lead to Beauty
31	White Paper	Public Practice	Planning	Professional Body	"The new planning system should be matched with a new national investment programme in public planning. This investment should recognise planning's wider value as a public service. **Funding should be allocated based on the need for proactive planning to support levelling up, not only the demand for growth.** This demands a comprehensive resourcing strategy that goes beyond initial time-limited funding for the transition to a settlement that gives Authorities the certainty to commit to longer-term resourcing" "proposals for Authorities to take on the responsibility for locally-produced Design Codes in Growth Areas, as well as tailoring "pattern books" for Renewal Areas, offer significant potential for more proactive planning - but also **present the risk of causing delays if they are not adequately resourced.** Public Practice supports the principle of local authority-led Design Codes for all sites suitable for substantial development. There would be major efficiencies and public benefits from Authorities carrying out this work in a strategic, joined-up way that is democratically accountable and open to community participation. It should be recognised that this is equivalent to handing Authorities the responsibility for carrying out outline applications for every strategic site in their area - at the same time as producing their Local Plan. To do it well, Authorities will need to have access to the equivalent resources that the private sector invest in RIBA Stages 1 & 2"	• Lack of resources in LAs to implement design codes • Codes likely to create inequality

Respondent: **Hannah Averbeck** Submitted on: Sunday, 5 June 2022, 8:35 PM

Ethical Clearance Pro Forma

It is important for you to include all relevant information about your research in this form, so that your supervisor can give you the best advice on how to proceed with your research.

You are advised to read though the relevant sections of UCL's Research Integrity guidance to learn more about your ethical obligations.

Please ensure to save a copy of your completed questionnaire BEFORE hitting 'submit' (you will not be able to access it later).

Submission Details

1 * Please select your programme of study.

MPlan City Planning	: MPlan City Planning

2 * Please indicate the type of research work you are doing.

☐ Dissertation in Planning (MSc)
☑ Dissertation in City Planning (MPlan)
☐ Major Research Project

3 * Please provide the current working title of your research.

If Beauty is the answer, what is the question? A discourse analysis of beauty within national planning policy

4 * Please select your supervisor from the drop-down list.

Martins, Juliana	: Martins, Juliana

Research Details

5 * Please indicate here which data collection methods you expect to use. Tick all that apply.

☐ Interviews
☐ Focus Groups
☐ Questionnaires (including oral questions)

☐ Action research
☐ Observation / participant observation
☐ Documentary analysis (including use of personal records)
☐ Audio-visual recordings (including photographs)
☐ Collection/use of sensor or locational data
☐ Controlled trial
☐ Intervention study (including changing environments)
☐ Systematic review
☑ Secondary data analysis
☐ Advisory/consultation groups

6 * Please indicate where your research will take place.

UK only	: UK only

7 * Does your project involve the recruitment of participants?

'Participants' means human participants and their data (including sensor/locational data and observational notes/images.)

○ Yes ◉ No

Appropriate Safeguard, Data Storage and Security

8 * Will your research involve the collection and/or use of personal data?

Personal data is data which relates to a living individual who can be identified from that data or from the data and other information that is either currently held, or will be held by the data controller (you, as the researcher).

This includes:

- Any expression of opinion about the individual and any intentions of the data controller or any other person toward the individual.
- Sensor, location or visual data which may reveal information that enables the identification of a face, address etc. (some postcodes cover only one property).
- Combinations of data which may reveal identifiable data, such as names, email/postal addresses, date of birth, ethnicity, descriptions of health diagnosis or conditions, computer IP address (of relating to a device with a single user).

○ Yes ◉ No

9 * Is your research using or collecting:

- special category data as defined by the General Data Protection Regulation*, and/or
- data which might be considered sensitive in some countries, cultures or contexts?

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- which reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership;
- concerning health (the physical or mental health of a person, including the provision of health care services);
- concerning sex life or sexual orientation;
- genetic or biometric data processed to uniquely identify a natural person.

○ Yes ◉ No

10 * Do you confirm that all personal data will be stored and processed in compliance with the General Data Protection Regulation (GDPR 2018)?

○ Yes
○ No
◉ I will not be working with any personal data

11 * I confirm that:

☑ The information in this form is accurate to the best of my knowledge.
☐ I will continue to reflect on, and update these ethical considerations in consultation with my supervisor.

You **MUST** download a copy of your responses to submit with your proposal, and for your own reference.

To do this, use the print screen function of your web browser, and print to PDF in order to save.

RISK ASSESSMENT FORM

FIELD / LOCATION WORK

^UCL

The Approved Code of Practice - Management of Fieldwork should be referred to when completing this form

http://www.ucl.ac.uk/estates/safetynet/guidance/fieldwork/acop.pdf

DEPARTMENT/SECTION   - Bartlett School of Planning
LOCATION(S)   N/A
PERSONS COVERED BY THE RISK ASSESSMENT N/A

NO ACTIVE FIELDWORKD

Consider, in turn, each hazard (white on black). If **NO** hazard exists select **NO** and move to next hazard section.

If a hazard does exist select **YES** and assess the risks that could arise from that hazard in the risk assessment box.

Where risks are identified that are not adequately controlled they must be brought to the attention of your Departmental Management who should put temporary control measures in place or stop the work. Detail such risks in the final section.

ENVIRONMENT	The environment always represents a safety hazard. Use space below to identify and assess any risks associated with this hazard
e.g. location, climate, terrain, neighbourhood, in outside organizations, pollution, animals.	No risk as no fieldwork

CONTROL MEASURES	Indicate which procedures are in place to control the identified risk

	work abroad incorporates Foreign Office advice
	participants have been trained and given all necessary information
	only accredited centres are used for rural field work
	participants will wear appropriate clothing and footwear for the specified environment
	trained leaders accompany the trip
	refuge is available
	work in outside organisations is subject to their having satisfactory H&S procedures in place
	OTHER CONTROL MEASURES: please specify any other control measures you have implemented:

EMERGENCIES	Where emergencies may arise use space below to identify and assess any risks
e.g. fire, accidents	N/A

CONTROL MEASURES	Indicate which procedures are in place to control the identified risk

	participants have registered with LOCATE at http://www.fco.gov.uk/en/travel-and-living-abroad/
	fire fighting equipment is carried on the trip and participants know how to use it
	contact numbers for emergency services are known to all participants
	participants have means of contacting emergency services
	participants have been trained and given all necessary information
	a plan for rescue has been formulated, all parties understand the procedure
	the plan for rescue /emergency has a reciprocal element
	OTHER CONTROL MEASURES: please specify any other control measures you have implemented:

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EQUIPMENT	Is equipment used?	NO	If 'No' move to next hazard
			If 'Yes' use space below to identify and assess any risks
e.g. clothing, outboard motors.			

CONTROL MEASURES	Indicate which procedures are in place to control the identified risk

	the departmental written Arrangement for equipment is followed
	participants have been provided with any necessary equipment appropriate for the work
	all equipment has been inspected, before issue, by a competent person
	all users have been advised of correct use
	special equipment is only issued to persons trained in its use by a competent person
	OTHER CONTROL MEASURES: please specify any other control measures you have implemented:

LONE WORKING	Is lone working		If 'No' move to next hazard

	a possibility?	NO	If 'Yes' use space below to identify and assess any
			risks

e.g. alone or in isolation

lone interviews.

CONTROL MEASURES	Indicate which procedures are in place to control the identified risk

	the departmental written Arrangement for lone/out of hours working for field work is followed
	lone or isolated working is not allowed
	location, route and expected time of return of lone workers is logged daily before work commences
	all workers have the means of raising an alarm in the event of an emergency, e.g. phone, flare, whistle
	all workers are fully familiar with emergency procedures
	OTHER CONTROL MEASURES: please specify any other control measures you have implemented:

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ILL HEALTH	The possibility of ill health always represents a safety hazard. Use space below to identify and assess any risks associated with this Hazard.
e.g. accident, illness, personal attack, special personal considerations or vulnerabilities.	N/A

CONTROL MEASURES	Indicate which procedures are in place to control the identified risk

	an appropriate number of trained first-aiders and first aid kits are present on the field trip
	all participants have had the necessary inoculations/ carry appropriate prophylactics
	participants have been advised of the physical demands of the trip and are deemed to be physically suited
	participants have been adequate advice on harmful plants, animals and substances they may encounter
	participants who require medication have advised the leader of this and carry sufficient medication for their needs
	OTHER CONTROL MEASURES: please specify any other control measures you have implemented:

TRANSPORT	Will transport be required	NO	X	Move to next hazard
		YES		Use space below to identify and assess any risks
e.g. hired vehicles				

CONTROL MEASURES	Indicate which procedures are in place to control the identified risk

	only public transport will be used
	the vehicle will be hired from a reputable supplier
	transport must be properly maintained in compliance with relevant national regulations
	drivers comply with UCL Policy on Drivers http://www.ucl.ac.uk/hr/docs/college_drivers.php
	drivers have been trained and hold the appropriate licence
	there will be more than one driver to prevent driver/operator fatigue, and there will be adequate rest periods
	sufficient spare parts carried to meet foreseeable emergencies
	OTHER CONTROL MEASURES: please specify any other control measures you have implemented:

DEALING WITH THE PUBLIC	Will people be dealing with public	NO	If 'No' move to next hazard If 'Yes' use space below to identify and assess any risks

e.g. interviews, observing	Low levels of risk associated with potential conflicting views within focus groups and interviews

CONTROL MEASURES	**Indicate which procedures are in place to control the identified risk**

	all participants are trained in interviewing techniques
	interviews are contracted out to a third party
	advice and support from local groups has been sought
	participants do not wear clothes that might cause offence or attract unwanted attention
x	interviews are conducted at neutral locations or where neither party could be at risk
	OTHER CONTROL MEASURES: please specify any other control measures you have implemented:

WORKING ON OR **NEAR WATER**	**Will people work on** **or near water?**	**NO**	**If 'No' move to next hazard** **If 'Yes' use space below to identify and assess any** **risks**
e.g. rivers, marshland, sea.			

CONTROL MEASURES	**Indicate which procedures are in place to control the identified risk**

	lone working on or near water will not be allowed
	coastguard information is understood; all work takes place outside those times when tides could prove a threat
	all participants are competent swimmers
	participants always wear adequate protective equipment, e.g. buoyancy aids, wellingtons
	boat is operated by a competent person
	all boats are equipped with an alternative means of propulsion e.g. oars
	participants have received any appropriate inoculations
	OTHER CONTROL MEASURES: please specify any other control measures you have implemented:

MANUAL HANDLING (MH)	Do MH activities take place?	NO	If 'No' move to next hazard If 'Yes' use space below to identify and assess any risks
e.g. lifting, carrying, moving large or heavy equipment, physical unsuitability for the task.			

CONTROL MEASURES	**Indicate which procedures are in place to control the identified risk**

	the departmental written Arrangement for MH is followed
	the supervisor has attended a MH risk assessment course
	all tasks are within reasonable limits, persons physically unsuited to the MH task are prohibited from such activities
	all persons performing MH tasks are adequately trained
	equipment components will be assembled on site
	any MH task outside the competence of staff will be done by contractors
	OTHER CONTROL MEASURES: please specify any other control measures you have implemented:

SUBSTANCES	Will participants work with	**NO**	If 'No' move to next hazard If 'Yes' use space below to identify and assess any
	substances		risks
e.g. plants, chemical, biohazard, waste	N/A		

CONTROL MEASURES	Indicate which procedures are in place to control the identified risk

	the departmental written Arrangements for dealing with hazardous substances and waste are followed
	all participants are given information, training and protective equipment for hazardous substances they may encounter
	participants who have allergies have advised the leader of this and carry sufficient medication for their needs
	waste is disposed of in a responsible manner
	suitable containers are provided for hazardous waste
	OTHER CONTROL MEASURES: please specify any other control measures you have implemented:

OTHER HAZARDS	Have you identified any other hazards?	**NO**	If 'No' move to next section If 'Yes' use space below to identify and assess any
			risks
i.e. any other hazards must be noted and assessed here.	Hazard: Risk: is the risk		

CONTROL MEASURES	Give details of control measures in place to control the identified risks

Have you identified any risks that are not adequately controlled?	NO	X	Move to Declaration
	YES		Use space below to identify the risk and what action was taken

Is this project subject to the UCL requirements on the ethics of Non-NHS Human Research?	NO

If yes, please state your Project ID Number	

For more information, please refer to: http://ethics.grad.ucl.ac.uk/

| DECLARATION | The work will be reassessed whenever there is a significant change and at least annually. Those participating in the work have read the assessment. |

Select the appropriate statement:

| x | I the undersigned have assessed the activity and associated risks and declare that there is no significant residual |

risk

| | I the undersigned have assessed the activity and associated risks and declare that the risk will be controlled by |

the method(s) listed above

NAME OF SUPERVISOR   Dr Juliana Martins

FIELDWORK   5   May 2010

MPlan Dissertation Submission

FINAL GRADE

/100

GENERAL COMMENTS

Instructor

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