



Office of the
Deputy Prime Minister

Creating sustainable communities

Planning and Diversity: Research into Policies and Procedures



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CONTENTS

Executive Summary	i
Chapter 1 Introduction.....	1
Chapter 2 Diversity: the context for change	4
Chapter 3 Knowledge and Understanding of Diversity	16
Chapter 4 Diversity, Planning Policy and Plan-Making	23
Chapter 5 Development Control and Diversity	31
Chapter 6 Diversity, Social Exclusion and Regeneration	37
Chapter 7 Planning Policy Guidance and Diversity	44
Chapter 8 Recommendations	53
Bibliography	55

Planning and Diversity: Research into Policies and Procedures

Executive Summary

The main purpose of this research is to inform the review of existing national planning policies and guidance (PPGs), to ensure it addresses the needs of a diverse society and is fully compliant with relevant equalities legislation. The research specifically focuses on examining the effectiveness of PPGs in terms of meeting the needs of a diverse society, as well as the promotion of diversity.

The research was undertaken over a six month period between December 2002 and May 2003. The research has gathered a range of information using a variety of methods, which include: updating an existing literature review already undertaken by the ODPM; a questionnaire survey of all English LPAs; diversity proofing of all PPGs; a series of key actor interviews with representatives from umbrella organisations; and, finally a series of case studies of LPAs and the Planning Inspectorate. (For further details see Appendices 1-11)

Greater equality is a priority for government and getting it right will help deliver on the wider policy objectives of improving public services, social inclusion and building economic capacity. The ODPM has set out a clear rationale for equality and diversity being relevant to its work. Mainstreaming diversity is seen as integral to the department's policy portfolio and has a direct relationship to the effectiveness of their delivery agenda. The equality agenda is therefore not an 'add on' to the work of the ODPM, but is very much at its centre.

Equality is essentially about creating a fairer society where everyone can participate and has the opportunity to fulfil their potential. It is backed by legislation designed to address unfair discrimination that is based on membership of a particular group. Diversity, as it is currently conceptualised, is about everyone. It is about creating a working culture and practices that recognise, respect, value and harness difference for the benefit of the organisation and the individual. There are many characteristics of diversity, but these will broadly fall within three dimensions – social, demographic and cultural. However, equality and diversity are not inter-changeable concepts, they are inter-dependent. There can be no equality of opportunity if diversity and difference is not recognised and valued.

Mainstreaming diversity into PPGs is key to the delivery of an effective planning system. The government wants planning policies that are relevant to people's lives and to the diverse make up of society. The way the environment is organised can affect quality of life, by making particular ways of life more or less easy to lead. Different groups and/or individuals demand

different things from the environment; there is no one size fits all in the way that past policy, at times, espoused.

Policies and processes can unwittingly be insensitive to some groups and/or individuals, and may well, unintentionally, discriminate against some sections of society. This was the core message of the McPherson report. In a context whereby social inclusion and diversity are strategic objectives of government, it is clear that planning policies and processes need to be sure about who gains and, potentially loses from different types of planning policies, practices and procedures.

In practical terms, the changing legislative context is one whereby an inclusive policy agenda is required of policy practitioners. The growing body of UK equality legislation, makes it clear that there is a requirement to ensure that issues of diversity are fully considered in all policy developments, as well as the delivery of goods and services. This is important in a context where the costs of non-compliance are, potentially considerable.

Widespread social and demographic change over the last three decades mean that equality and diversity issues are no longer minority considerations. Key social developments have taken place across England and Wales and as a consequence modern life has become increasingly more complex. Inevitably, this means that there is a changing social context for spatial planning.

While the concept of diversity is one that seeks to get away from a focus on specific groups, it is still helpful to make the connections between spatial planning issues and groups. Some individuals and groups have very specific needs, but equally, there are also many shared and overlapping concerns, which cut across all groups in society. Many of these shared issues are at the heart of building inclusive, sustainable communities, such as, appropriate, well designed, affordable housing, which are co-located with a range of accessible facilities, good quality transport, safe, accessible, sensitively designed environments and the need for greater involvement in planning.

Key findings

Knowledge and understanding of diversity:

- Diversity is a relatively new term and planners' understanding of it is clouded by unfamiliarity. Issues about diversity and planning are not well understood or a priority in planning practice and procedure. The biggest difficulty for planning officers is not knowing how to relate spatial planning to diversity issues, which is not surprising because there is currently little advice on this topic.
- Some LPAs are of the view that diversity issues are not appropriate planning matters. In rural areas, or places where there is a perception of a more or less homogenous population, some planners also find it difficult to

see the purpose of planning for diversity. There is also a view that strategic planning issues are neutral to diversity issues as they are too far removed from 'people based issues'.

- In defining diversity, most LPAs attach the term to a range of discrete groups, such as disabled people, women, BME communities, and older people. Often diversity is defined solely in relation to race, with little recognition of diversity in the wider population or indeed within BME communities. The knowledge that LPAs have of diverse groups is dated and likely to perpetuate policies that are problematical. Most local authorities provide some training on diversity issues, but only a minority provide training on the interrelationships between planning and diversity.
- Planners lack knowledge of diversity issues and are also of the opinion that organisations like the ODPM and the RTPI, are not providing much by way of guidance on planning and diversity. Information and guidance on diversity and planning is crucial because planners do not know how to relate land use matters to the needs of diverse members of the community, except in the most obvious of cases, e.g. wheelchair users access to public buildings.

Diversity, planning policy and plan-making:

- Just over half of LPAs reported that they have diversity policies in their development plans, however, policies focus on the needs of specific groups, most notably, gypsies and travellers and disabled people. Diversity, as such, is rarely mentioned. Policies for disabled people are most common in development plans and generally focus on physical access to buildings.
- Impact appraisal of plans and policies on particular groups is also weak and under developed in development plans. There is a need for better analysis of plans and policies in the form of diversity proofing and the assessment of impacts on different groups in the community.
- PPGs guide, inform and help frame development plan policy, but a significant minority feel they are unhelpful in providing guidance on diversity, however, there are examples of RPG, which explicitly refer to reducing inequalities and promoting social inclusion. Good practice advice is required to help LPAs translate diversity into tangible development plan policies, make the connections between diversity and spatial planning and assist with resolving policy conflicts related to diversity.
- A large minority of LPAs report that they do not consult with key groups in the local community, although there is evidence that some authorities are trying to engage so-called 'hard to reach' groups, but here too good practice guidance is required. National umbrella organisations have urged planners to think more imaginatively and creatively about consultation techniques to engage a wider cross section of people. Consultation is a

key priority for planning, but progress may be slow and uneven unless stronger direction is given in PPGs.

Diversity and development control:

- Development control officers find it difficult to make the connections between development proposals and diversity, other than in relation to physical accessibility, where there is greater sensitivity to the access implications of proposals. The lack of clear guidance in PPGs compounds the problem. Spatial impacts of proposals are generally limited to neighbours as interested parties, and consultation with diverse groups in the local community is patchy.
- Diversity is seen as yet another issue to balance and some practitioners are concerned that the system is becoming too complex as it is being asked to address ever more sophisticated policy objectives.
- Training appears to focus on that which is legislatively necessary, such as disability, therefore it is not surprising that lack of knowledge and awareness are perceived as major barriers to addressing diversity and planning. Equally, national and local equality organisations (with the exception of disability) appear to lack knowledge of, and confidence in, making the connections between planning and diversity.
- There appears little awareness of the implications of the post – Macpherson agenda for development control and there is little recognition that organisational cultures can unintentionally result in institutionally discriminatory practices. Good practice in the Planning Inspectorate illustrates how training within a supportive organisational framework, can sensitise professionals to the potential for procedural injustice. National planning organisations feel that currently the planning system delivers less for those who interact less well with it and thereby exacerbate social inequalities.

Regeneration:

- Regeneration is frequently delivered through local partnerships, composed of individuals drawn from a diverse range of backgrounds and interests. These partnerships are often required to involve and engage local communities and there is great potential for regeneration partnerships to address issues around planning and diversity.
- Although partnerships are responsible for planning and delivering significant change within geographical areas, partnership members are not required to have any formal planning expertise, nor are they required to have any formal contact with the LPA. There is a need, therefore, for better training on planning and diversity for local partnerships and for more formalised contact between partnerships and planning authorities.

Reviewing PPGs

- The PPG series contains no explicit reference to planning for diversity. It does contain a range of direct and specific references to identified groups in society, although this varies considerably across the series. The most common references within the 'key groups' are to disabled people and access is the key issue that permeates the PPGs. References are generally isolated in their occurrence and do not demonstrate a systematic approach to diversity issues or of the particular needs of the key groups.
- Procedural issues in PPGs do not consider diversity issues and appear insensitive to the needs of specific groups. In relation to participation and involvement, key groups are addressed differently with no evident rationale for this. Only occasional references are made to monitoring the impact of planning policies and decisions on different groups in society.
- Some LPAs do not identify diversity as a relevant land-use planning issue. Local authorities recognising diversity as an important policy consideration note a lack of effective policy advice and good practice guidance on the land-use implications or spatial planning aspects of diversity. PPGs are regarded as the principal means of legitimating diversity as a relevant planning consideration. Good practice guidance could provide LPAs with some practical measures for translating diversity issues into realisable planning policies and proposals.
- Representative groups/organisations value the opportunity to influence the content of the PPG series, although the research reveals that it is only disability organisations that appear to be positive on the extent to which Government is addressing their concerns.
- Equality and diversity must run through the planning system as one of its guiding principles. PPG1 needs a headline statement that good planning acknowledges and responds to the diverse needs of a complex society, which is composed of people with very different ways of life, aspirations and needs.
- A discussion of the policy implications for diverse groups should be incorporated in each relevant PPG as an application of the general principles set out in PPG1. PPGs 1 and 12 should also require LPAs to assess the potential impacts of policies and proposals on different social groups and provide appropriate advice to assist implementation. Relevant PPGs should insist that enforcement, consultation on development plans, and other processes are monitored.
- A fresh approach to drawing up PPGs is needed, which should involve: consultation with key stakeholders prior to the first draft, to discuss their concerns and aspirations; drafting, followed by diversity proofing; and finally, a re-draft discussed with key stakeholders. Consultation with a wide and varied range of groups should take then place.

- It is important that the effects of national guidance for diverse groups are monitored, and the results both publicised and fed in to future policy making.

Recommendations

The research on planning and diversity should be used to support culture change in the ODPM and planning profession more generally. The findings of the research, together with the recommendations, will be used internally within the ODPM to inform and guide the review of PPGs. The findings will also be used externally to prepare a series of shorter, highly focussed reports for LPAs, professional bodies, equalities bodies and key public and voluntary sector organisations involved in planning, development and regeneration, to disseminate the findings, raise awareness and develop knowledge on planning and diversity.

The recommendations for implementation by the ODPM are set out below:

Priority: High

1. The PPG review process should:
 - set up an external reference group on planning and diversity to advise on, and inform, the revisions to each PPG and the related consultation process. The group must be representative of a wide range of interests to provide expert and informed input on diversity issues
 - undertake diversity proofing of draft PPGs and amendments to PPGs, which result from consultation
 - engage with a wide and varied range of user-groups and stakeholders with interests related to diversity during consultation on draft PPGs. Short highly focussed reports on planning and diversity should be used to support the consultation process and enable key stakeholders to effectively engage with the process.
2. The review of PPGs should ensure that:-
 - a headline statement on planning and diversity is included in PPG 1, General Principles and Policy, which identifies diversity as a legitimate planning consideration; defines diversity; and provide worked examples. It should also provide advice for dealing with major applications on how to assess the implications for diverse social groups
 - a discussion of the policy implications for diverse groups should be incorporated in each relevant PPG as an application of the general principles set out in PPG1. Clear direction on planning and diversity issues, should be provided, including policy conflicts, where they involve diversity issues. A consistent and systematic approach to the

coverage of diversity issues across the PPG series should be adopted and policy objectives must also be made explicit

- PPG12, Development Plans, should require LPAs to provide clear development plan policies in relation to diversity, which will assist development control officers in dealing with individual applications. It should also require LPAs to make an assessment of the impacts on different groups or communities in the development plan. Advice on undertaking diversity impact assessment should be issued with PPGs 12 &
3. Develop good practice guidance on planning and diversity to provide LPAs with some practical measures for translating diversity issues into realisable planning policies and proposals, and support the effective delivery and implementation of policy/policies on planning and diversity set out in PPGs.

Priority: Medium

4. Provide advice for all those involved in plan-making, development control and enforcement to understand what is meant by institutional discrimination, and the significance of techniques such as monitoring and consultation in tackling institutional discrimination and addressing diversity more generally.
5. Encourage LA's to provide training on planning and diversity to secure legislative compliance from LPAs, to develop knowledge and understanding of institutional discrimination and ensure delivery of equality and diversity in the planning system.
6. Encourage LA's and Regeneration Partnerships to provide training in planning, regeneration and diversity to develop understanding and expertise and develop better links between planning and regeneration.
7. Best Value inspections should assess the performance of LPAs in addressing diversity in plan-making, local planning policy, development control and enforcement, monitoring and training and relevant indicators developed.

Chapter 1

Purpose of the Research

Introduction

- 1.1. Greater equality is a priority for government. Getting it right will help deliver on the wider policy objectives of improving public services, social inclusion and building economic capacity. The ODPM has set out a clear rationale for equality and diversity for the work of its department and this agenda underpins the organisation's aim to be fit for purpose and representative of the public they serve. Mainstreaming diversity is seen as integral to the department's policy portfolio and has a direct relationship to the effectiveness of their delivery agenda. There is also a specific relationship between equality of opportunity, the social inclusion agenda and effective local and regional government. The focus on rebuilding deprived communities, social inclusion, homelessness, housing, fair planning systems and empowering and engaging local communities presupposes consideration of equality and diversity. The equality agenda is therefore not an 'add on' to the work of the ODPM, but is very much at its centre.

'Our policies have a major impact on people's lives and on communities and we should ensure that they are attuned to the needs of diverse groups and help address social inequality'. (ODPM, 2003)

Equality and mainstreaming diversity

- 1.2. There is a complex and dynamic legislative framework in support of equality and diversity to which the cost of non-compliance is considerable. The employment implications of the legislation are well known, but there is now also an increasing attention on policy development, service delivery and community engagement. The catalyst for public bodies was the Stephen Lawrence inquiry and the acknowledgement of institutional racism¹, and the subsequent legislative duty placed on public bodies in the Race Relations Amendment Act (RAA), 2000, to take proactive steps to ensure race equality. The government has since stated its intention to extend this public sector duty to gender and disability.

¹ '...the collective failure of an organisation to provide an appropriate and professional service to people because of their colour, culture or ethnic origin. It can be seen or detected in processes, attitudes and behaviour which amount to discrimination through unwitting prejudice, ignorance, thoughtlessness, and racist stereotyping which disadvantage minority ethnic people' The MacPherson report Feb. 1999.

- 1.3. Equality is essentially about creating a fairer society where everyone can participate and has the opportunity to fulfil their potential. It is backed by legislation designed to address unfair discrimination that is based on membership of a particular group. Equality is also perceived as a basic component of a modern civilised society.
- 1.4. Diversity, as it is currently conceptualised, is about everyone. It is about creating a working culture and practices that recognise, respect, value and harness difference for the benefit of the organisation and the individual. There are many characteristics of diversity, but these will broadly fall within three dimensions – social, demographic and cultural. However, equality and diversity are not inter-changeable concepts, they are inter-dependent. There can be no equality of opportunity if diversity and difference is not recognised and valued.

Purpose of the research

- 1.5. The Government recognises the need to have policies which are relevant to the lives that people live today, and which take into account the diverse make-up of the population. It is important that individuals and groups which make-up a diverse society are being catered for. The main purpose of this research is to inform the review of existing PPGs, to ensure it addresses the needs of a diverse society and is fully compliant with relevant equalities legislation. The research specifically focuses on examining the effectiveness of national planning policies and guidance in terms of meeting the needs of a diverse society, as well as the promotion of diversity.
- 1.6. A summary of the key objectives is set out below:
 - To examine how existing PPGs address diversity within a changed legislative context and identify areas for improvement
 - To assess the level of knowledge and awareness of diversity in LPAs and the Planning Inspectorate and the implications for planning policy and practice in development plans and development control
 - To assess how PPGs have been translated into development plans and SPG to reflect the needs of a diverse society
 - To evaluate what actions have been taken by the ODPM, the Planning Inspectorate and LPAs to ensure that the planning process does not disadvantage any user or group of users
 - To explore the linkages between PPGs, the development plans and development control system and the social exclusion and neighbourhood renewal agenda

Approach

- 1.7. The research was undertaken over a six month period between December 2002 and May 2003. The research has gathered a range of information using a variety of methods, which include: updating an existing literature review already undertaken by the ODPM; a questionnaire survey of all English LPAs; diversity proofing of all PPGs; a series of key actor interviews with representatives from umbrella organisations; and, finally a series of case studies of LPAs and the Planning Inspectorate. (For further details see Appendices 1-11)

Chapter 2

Diversity: the context for change

Introduction

- 2.1. This chapter sets out the context for addressing planning and diversity. It focuses on four key areas: why diversity is key to the delivery of an effective planning system; the changing legislative framework; the changing social context for spatial planning; and a brief review of key groups and spatial planning issues.

Diversity: Delivering an effective planning system

- 2.2. The emerging agenda on sustainable cities and places recognises the importance of placing people at the fulcrum of new planning agendas. In the Urban White Paper (DETR, 2000: 9) it is noted that planning policy should include everyone because it is a mark of a decent society. The White Paper also suggests that planning must reflect the diverse needs of society: strategies must be tailored to each area and the people who live there (DETR, 2000: 8).
- 2.3. Planning policy affects the allocation and distribution of resources to different types of people. It is neither neutral nor benign in its social distributive effects. Rather, planning has the potential to influence who gets access to what resources. In a rapidly changing society, with shifts in demographics, ethnic mix, social attitudes, and behaviour, it is clear that planning faces new challenges in ensuring that the evolving social complexity is responded to in ways that reflect the government's agenda, one in which all groups and/or individuals benefit from planning policy and practice.
- 2.4. Diversity is key to the delivery of an effective planning system for a number of reasons. The government wants planning policies which are relevant to people's lives and to the diverse make up of society. In particular, the government is seeking to promote a common civic culture premised on multicultural places, characterised by convivial public spaces that will encourage social interaction and inclusion. Such objectives identify a series of exciting and exacting roles for planning in seeking to create cities and spaces based on difference, tolerance to difference, and mutual interaction and respect.
- 2.5. The way the environment is organised can affect quality of life, by making particular ways of life more or less easy to lead. Different groups and/or individuals demand different things from the environment; there is no one size fits all in the way that past policy, at times, espoused. The challenge, therefore, is to develop knowledge of

a diverse society and its needs, and to demonstrate how planning is able to respond in ways that do not prioritise one lifestyle and/or culture over another, to the detriment of others. Diversity issues are, in this sense, integral to good planning.

- 2.6. It is well known that policies and processes can unwittingly be insensitive to some groups and/or individuals, and may well, unintentionally, discriminate against some sections of society. This was the core message of the McPherson report. In a context whereby social inclusion and diversity are strategic objectives of government, it is clear that planning policies and processes need to be sure about who gains and, potentially loses from different types of planning policies, practices and procedures. The focus on diversity is important because it draws attention, precisely, to issues about procedural and substantive bias and partiality.
- 2.7. In practical terms, the changing legislative context is one whereby an inclusive policy agenda is required of policy practitioners. Thus, planning policy has to demonstrate that it is complying with, and sensitive to, the requirements of civil rights legislation, such as the Disability Discrimination Act (1995). This is important in a context where the costs of non-compliance are, potentially considerable.

A changing legislative context for spatial planning

- 2.8. In the last quarter of a century legal protection in the form of civil rights legislation has unfolded to give greater equality to women (Sex Discrimination Act, 1975) and to Black and Ethnic Minorities (BMEs) (Race Relations Act 1965, 1968, 1976, Race Relations Amendment Act 2000). More recently, the Disability Discrimination Act 1995 has been incrementally rolled out to address some issues faced by disabled people. Older people and groups such as gay men and lesbians are also gaining political confidence, but as yet do not have equality with others under UK law, although this is set to change in the near future. See paragraph 2.11 (Older people are only covered by existing equality legislation on the basis of their sex, race and disability).
- 2.9. Significantly for the planning system, the growing body of UK equality legislation, makes it clear that there is a requirement to ensure that issues of diversity are fully considered in all policy developments, as well as the delivery of goods and services. The areas covered by existing equalities legislation include: sex and marital status and equal pay; ethnic origin, race, nationality and colour; religion (NI Only); disability (current and past); transsexuals (gender reassignment); pregnancy and maternity; parental leave; ex-offenders; and human rights.

- 2.10. Specific legislation that provides a context for the consideration of planning and diversity in development plans and development control is set out below, together with other legislation, which may also prove useful in the consideration of diversity issues in the planning system.

Equalities legislation

- Sex discrimination Act 1975
- Race Relations Act 1976
- Disability Discrimination Act 1995
- Human Rights Act 1998
- Race Relations Amendment Act 2000
- European Equal Treatment Directive

Other useful legislation

- Equal Pay Act 1970
- Rehabilitation of Offenders Act 1974
- Fair Employment (Northern Ireland) Act 1989
- Criminal Justice and Public Order Act 1994
- Employment Rights Act 1996
- Parental Leave Directive 1999
- Asylum and Immigration Act 1999
- European Pregnant Workers' Directive

- 2.11. Impending legislation that will impact greatly on broadening the scope of the diversity agenda will take account of: religion and beliefs (2003); sexual orientation (2003); adoptive leave (2003); age (2006); civil partnerships; legal recognition of acquired gender; plus enhancements in relation to race, disability, gender and equal pay in 2003-6. However, forthcoming legislation on Religion, Sexual orientation and age will be restricted to employment and vocational training.

- 2.12. There is also a strong European policy framework for taking the diversity agenda forward and embedding the concept within planning policy guidance. Equality policy in the EU originated from the Article 119 of the founding Treaty of Rome, 1957. Subsequently, the EU put in place a complex set of legal provisions aimed at giving women access to employment, vocational training, working conditions and social protection. Since the 1970s these legal provisions have been progressively strengthened by a series of council resolutions and recommendations, some of which are binding on member states. Above all, these recommendations and resolutions offer important advice to governments and signal the direction and pace of change. For instance, the Communication on Mainstreaming Gender Equality effectively brought equal opportunities for women and men onto the agenda for all Community policies and activities.

- 2.13. Subsequently, Article 13 of the Treaty of Amsterdam, 1998, has committed all member states of the EU to take appropriate action to combat discrimination. This has been followed by a European Council Directive on the principle of equal treatment between persons, irrespective of their racial or ethnic origin, and a Community Action Programme to Combat Discrimination based on racial or ethnic origin, belief, disability, age or sexual orientation. In 2000 the Nice European Council Meeting proclaimed the Charter of Fundamental Rights, and in the same year the Human Rights Act, 1998, came into force in the UK.

A changing social context for spatial planning

- 2.14. Widespread social and demographic change over the last three decades mean that equality and diversity issues are no longer minority considerations. (See figure 1: Census headline indicators for England and Wales, 2002) Key social developments have taken place across England and Wales and as a consequence modern life has become increasingly more complex. For instance, increasing numbers of women are entering the labour market, nowhere more so than the UK. This increase, in particular the rise of part-time workers, has led to a more complex home/work balance and patterns of care, which in turn leads to more complex patterns of mobility and transport, as well as a growth in paid household services, childcare provision, institutional care and elder care. Furthermore, an ageing population, lower fertility/mortality rates and lower marriage/higher divorce rates exacerbate the factors noted above. Other factors such as the growth in knowledge based learning and the restructuring of industry has led to more flexible work patterns, seven-day a week working, tele-working, and home-working, which impacts on the location and design for new businesses, as well as impact mobility and labour market participation.
- 2.15. Understanding and responding to social and demographic change is made even more complex when overlaid with issues of diversity. Since 1991 the census reveals that the BME population has risen from 6% to 9% in 2001. More specifically as figure 1 shows, BME populations are not evenly spread across our cities, towns and villages, they are often concentrated in particular neighbourhoods, each with their own characteristics closely related to their race, religion and culture.
- 2.16. Equally, the needs of disabled people are diverse and found in every section of society, with over 19% of the population reporting a long-term illness, health problem or disability. Since 1991, there has been a 3.4% increase in people over 65 years (see figure 1) and this trend looks set to continue. Therefore, as the population ages, so too the needs of disabled people may increase. These socio-economic changes have important repercussions for the way in which households are managed and the way in which people lead their

everyday lives, which in turn has a profound effect on space, spatial activities and movements in space.

- 2.17. While the concept of diversity is one which seeks to get away from a focus on specific groups and neat boxed up categories, for practising planners it is still helpful to make the connections between spatial planning issues and groups. Therefore a brief review of some of the diverse groups and the related spatial planning issues is set out in the following section. Although clearly some individuals and groups have very specific needs, there are also many shared and overlapping concerns, which cut across all groups in society and are at the heart of building inclusive, sustainable communities. Shared issues include: appropriate, well designed, affordable housing, co-located with a range of accessible facilities, good quality transport, safe, accessible, sensitively designed environments and the need for greater involvement in planning.

Figure 1: Census headline indicators for England and Wales, 2001

- For the first time ever in England and Wales, there are now more people aged 60+ (20.9% population) than there are children under 16 (20.2%)
- Since 1991 there has been a 3.4% increase in people aged 65+
- Lone parents account for 10% of households, and 90% of lone parents are women - 50% of female lone parents are in work (mainly part time)
- Women remain clustered in low-paid occupations and are more likely to work part-time - Men work longer hours in jobs that pay more
- Almost $\frac{1}{3}$ of all households contain dependent children and nearly $\frac{1}{4}$ of all households consist of pensioners only
- 87.5% of the population is white British - the BME population has risen since 1991, from 6% to 9%
- In Leicester, the Indian community makes up 25.7% of the population, in Tower Hamlets, 33.4% is Bangladeshi, and 36% is Muslim, in Brent, 43.3% of population is white, and 56.7% is BME, in Newham, 39.4% is white, and 60.9% is BME, in Harrow, 21% is Indian,
- National figures show a growing multifaith society, 71% - Christian, 1.1% - Hindu, 0.5% - Jewish, 3% - Muslim, 0.6% - Sikh. In Harrow, 19.6% is Hindu, Barnet - 14.8% is Jewish, and Hounslow and Ealing - 8% is Sikh
- 18.2% of the population (9.5 million) have a long-term illness, health problem or disability which limits their daily activities or work. Of these, 4.3 million are of working age (equal to 1 in 8 of the working age population)

- The proportion of the population that have a long-term illness, health problem or disability is up by 13.3% from 1991
- 5.5% of the working age population are economically inactive due to sickness or disability

<http://www.statistics.gov.uk/census2001/default.asp>

Diversity and spatial planning issues: making the connections

2.18. It is important to stress that the reviews are not checklists, they identify a broad range of spatial planning issues. Place making is about understanding self and place identity and this can only be achieved through effective dialogue with as broad a range of stakeholders as possible. This links into thinking about modernising local government and the principles set out in the planning bill that advocates greater community involvement. A continuing dialogue is particularly important in discussing BME and faith communities whose views need to be sensitively differentiated and which may differ between parts of the country. In short, although knowledge of the connections between diverse groups and spatial planning issues is both desirable and useful, it is not a substitute for knowing the views of the local communities, individuals and groups.

Older People

2.19. Older people's issues have either been subsumed within the arguments for disability access or they have been viewed as a group, which has a need for "care", generally meaning specialist housing or supported living. This approach can result in treating older people as a residual or a problem group, but as the proportion of older population steadily increases addressing the needs of this section of society will assume a greater importance for planners.

2.20. Clearly many spatial planning issues impact on older people; housing, accessibility and centralisation and co-location of services. Housing, its location, affordability and suitability to expressed needs of older people remains a very central concern in determining quality of life. The majority of older people are owner occupiers, a significant proportion of whom can exercise choice in changing locations in the post work period. There is a growth in the numbers of retired people seeking market towns judging that these places have the right mix of services coupled with less crime and real community. There are issues about how these places may respond to older people and how larger towns and cities may become places that older people choose to live in. In some localities this may hinge on fear of crime but in others it may be about perceived lack of vibrancy of place.

- 2.21. Housing design is currently being critically examined with the aim of increasing the accessibility and suitability of mainstream housing. Lifetime Homes and the introduction of Part M for dwellings will increase opportunities for older people (as well as those with disabilities of any age). While housing is a central issue, the housing needs of older people from ethnic minority communities are not well explored. BME older people exhibit a diverse range of preferences, ranging from a marked desire to remain with their families eg Pakistani and Bangladeshi elders, to a desire for sheltered housing from the Chinese older people.
- 2.22. Issues of accessibility need to take on board the growth of car ownership and the evidence that older people are more likely than younger people to see their car as essential. If older people choose to drive then that suggests the need to develop electric cars, pay as you drive car sharing schemes; cars with drivers and other ventures. Clearly older people's needs must also be addressed in public transport services by joining up services and co-locating them at attractive transport nodes, which are well designed.

BME communities

- 2.23. The RRAA, 2000, extends the scope of the 1976 Act making it place a positive duty on a wide range of public authorities to promote race equality and good relations between different racial groups. While planning was specifically covered under the 1976 legislation, the new Act presents a new challenge to planners to address and readdress how it approaches the formal processes of plan making and development control as well as the informal processes of identifying priorities, consulting the broader community, networking with stakeholders and recognising minority needs and aspirations. A colour-blind approach based on a false belief that the planning processes are neutral in their impacts on different communities cannot be sustained. Instead what is needed is a proactive approach based on consultation with communities; race equality proofing of policies and procedures; collection of data together with analysis and monitoring which is sensitive to ethnicity.
- 2.24. The 2001 disturbances in Bradford, Oldham and Burnley raise uncomfortable issues of ethnic segregation. In these cities there has been a slow drift toward what might be termed self segregation among working class Asians and Whites living in their own neighbourhoods. Other British cities however exhibit similar levels of segregation at the neighbourhood level but appear to have higher levels of racial harmony. The issue of segregation may be a smokescreen. More vital may be the quality of the neighbourhood in terms of housing, environment, local facilities. There is a pressing need to systematically assess issues relating to housing design, safe neighbourhoods, sustainability, housing location and size, recreational and religious

provision and transport. Key to this is a commitment to understanding everyday lives among BME communities.

- 2.25. Cultural pluralism (ethnic, racial, sexual, generational) is the mark of a vibrant and evolving society and the challenge is to ensure that it can be achieved at a spatial level. The treatment of public space can play a part in celebrating ethnic diversity through public art, recognising and celebrating through different architectural forms enclaves that enrich a place such as Chinatowns.

Faith groups

- 2.26. In the last two years there has been a growth in realisation that faith communities may play a vital role in delivering neighbourhood renewal, however, this recognition has yet to be fully reflected in local practice. For planners it is clear that in terms of active membership churches, mosques, temples, synagogues and gurdwaras are often the most substantial local community-based organisations and embrace a broad range of people across generations and economic position. It is therefore important for planners to be able to identify key faith organisations and establish a contact database. As important is the ability to engage effectively and respectfully with diverse faith groups. (<http://www.urban.odpm.gov.uk/community/faith/involve/index.html>).

- 2.27. While faith groups can help planners and their partnerships understand the needs and concerns of local people or groups with particular needs there is a need for reciprocity in these relationships. Effective diversity planning demands a pro-active approach which includes identifying sites for places of worship and community centres; facilitating funding applications and supporting the ability of faith groups to strengthen their community role.

Gypsies and Travellers

- 2.28. Part II of the Caravan Sites Act, 1968, required local authorities to provide suitable sites for 'gypsies' in keeping with their nomadic lifestyle. The definition of 'gypsies' embedded in this Act was fairly broad, encompassing 'persons of nomadic habit of life, whatever their race or origin', which recognised that 'gypsies' are a heterogeneous group that comprises people from a diverse range of ethnicities. Since the introduction of the Criminal Justice and Public Order Act 1994, however, this definition has been revised through judicial review, which includes a more ethnic understanding of 'gypsies', and excludes some groups of whom travelling is a lifestyle choice.
- 2.29. The 1994 Act also introduced new regulations relating to trespass, making it an offence for those without a secure pitch to stop on the highway, or on land without express consent of the landowner. This has created increasing difficulties for travellers who are attempting to secure a site through the planning system. Travellers need to stop

while exploring the possibility of planning permission for a site, and yet the criminalisation of those without a pitch means that it is illegal for them to do so.

- 2.30. Research demonstrates that planning permission is often only given to sites that are tucked away from public view. There is a need for a balance to be struck between the needs of travellers to maintain their chosen lifestyle and the needs of others. This is particularly the case where there are potential conflicts such as the fluctuation and change of sites that may contravene the conditions set out in planning permission. This may be more marked in the summer, when summer gatherings - a key part of the traveller culture and economy - take place. The restrictions placed on traveller movements and settlements are such that sites are often closed down and travellers moved on to official sites, creating problems due to overcrowding. This disruption is a threat not only to the quality of life of travellers, but to traveller culture and lifestyle more generally. This indicates a need for a fresh approach which gives greater acknowledgement to gypsies and travellers ways of life.
- 2.31. Significantly, Romany Gypsies and Irish travellers are recognised as ethnic minorities under the Race Relations (Amendment) Act 2000. The Human Rights Act 1998 also means that all eviction and enforcement decisions made by public authorities must be 'proportionate'.

Women

- 2.32. Women, children and men use towns and cities in different ways, and thus face different problems. A good quality environment for women should be attractive, easy to use, convenient and safe and meet their specific needs. Women are particularly concerned about issues of personal safety and security, the provision of facilities and the detailed design of buildings and spaces particularly in residential areas, public buildings, shopping areas and city and town centres. Many women feel vulnerable in getting around, as users of public transport and as pedestrians, and their movement is often constrained by fear of attack. This is particularly true for older women and women with children travelling alone. Environments that work well during the day can feel hostile at night.
- 2.33. Access to services, or the lack of it, cuts across many areas of everyday life including transport, housing, employment, shopping and leisure and is concerned with the location and distribution of services and community and health facilities. Women are more likely to spend more time in and around the home and the local community therefore the provision of locally accessible services is particularly important.
- 2.34. The mobility of women is restricted by a wide variety of factors; low income, child care responsibilities, dependents, lack of access to a car,

inadequate public transport and fear of harassment or attack. Lack of mobility can restrict her movements and those of her dependents to the area local to her home. The many different roles that women play lead to a wide distribution of trip patterns to different locations. The trip length for a woman is often shorter than for men. Walking has been the most common form of travel for women and children, and the effect of the street environment on the personal safety and security of the walker is important, as well as the increased health risk from traffic pollution.

Children

- 2.35. The needs of the young child are often subsumed into the needs of parents particularly mothers. It is important that planners consider the everyday life matters of those with young children and babies not only in respect of access but in the provision of accessible and acceptable changing facilities and public toilets.
- 2.36. Children's play has been treated in a scant fashion by planners and developers alike and the provision for children's play is often treated in a minimalist way. Adults and children may have very different starting points. Adults are often concerned about crime, anti-social behaviour and perceived nuisance, while children want more choice in their free time. This suggests that local consensus building based on partnership, participation and project planning. All of these can and ought to involve children and young people (www.ncb.or.uk/cpc.htm).

Disabled people

- 2.37. The built environment seriously constrains the everyday lives of disabled people and thus creates barriers to their full participation in society. The built and managed environment has been seen as a concrete demonstration of the marginalised place for disabled people in British Society where disabled people are bounded into some space and excluded from others.
- 2.38. Since 1995 disabled people's position has been incrementally improved by the Disability Discrimination Act, 1995, though the requirement to create equal physical access does not bite till 2004. The Act makes it clear that from October 2004 service providers may have to make reasonable adjustments to the physical features of their premises to overcome physical barriers to access. The greater assimilation of disabled people as citizens who shop, work and are householders has been signalled in part by changes to buildings and the physical environment. A new emphasis on dignity and inclusion rather than "special needs" has been used by many local planning authorities to ensure that physical environments embrace inclusive design (Planning and Access for Disabled People : A Good Practice Guide, ODPM, 2003) that assists free movement by all members of society.

- 2.39. Until the Disability Discrimination Act, 1995, is fully implemented there is still a reliance on the Building Regulations to regulate the provision of accessible space. There is a poor fit however between the regulatory mechanism Part M, which is concerned with access into and within a building and the role of planners who are focused on the spaces between buildings.
- 2.40. Planning authorities frequently use a range of mechanisms including access officers and access committees to develop, promote and enforce access policies. The ability for disabled people to get involved in these is limited and barriers to involvement should be explored and eradicated in the interests of better dialogue and improved outcomes.
- 2.41. The Integrated Transport White Paper *A New Deal for Transport* (DETR, 1998), moves away from the traditional predict and provide model for transport planning however the debates are driven by environmental concerns rather than by any real awareness of the social impacts of transport. These include the needs of disabled people who may be impeded by physical and financial access.

People with HIV and AIDS

- 2.42. The needs of those living with HIV/AIDS are frequently overlapping with those of other citizen groups. The need for good access, an environment which is free of fear of crime and harassment all contribute to greater well-being for this group. Planners should be aware that those with HIV/AIDS are covered to some extent as a progressive condition but not as a diagnosis, by the Disability Discrimination Act 1995, but a commitment to diversity demands that their needs be considered. A challenge for planners is establishing effective dialogue with this group who may fear to be open about their condition. Seeking the views of representative bodies may be a way of beginning a relationship.

Gays and Lesbians

- 2.43. Being lesbian or gay can be such a fundamental part of a person's life that it tends to affect its every facet. However it is only recently that what has been viewed traditionally as a community of interest has been recognised as a spatial community.
- 2.44. Not surprisingly such spatial communities are urban phenomena. In larger towns and cities there is both greater acceptance and greater anonymity (as distinct from invisibility). The process is also undoubtedly exponential. A better cultural, social and welfare 'Gay Scene' has developed in urban areas. The clearest demonstration of this is the growth in many large British cities of a commercial lesbian and gay culture, which has led to the clustering of businesses and services. In some British cities these gay villages make an important contribution to cultural and economic vitality.

Conclusions

The key conclusions are set out below:

- Greater equality is a priority for government and mainstreaming diversity is central to the ODPM's policy portfolio and delivery agenda
- New agendas suggest that strategies must be tailored to meet the needs of each area and the diverse needs within society – there is no one size fits all
- There is growing body of equalities legislation, which provides a changed legislative context for spatial planning
- Key social developments that have taken place over the last three decades has meant that there is a changing social context for spatial planning
- Diverse groups and individuals have many shared and overlapping issues in relation to spatial planning: the need for appropriate, well designed, affordable housing, co-located with accessible facilities, good quality transport, safe, accessible, sensitively designed environments and the need for greater involvement in the planning process

Chapter 3

Knowledge and Understanding of Diversity

Key Findings

- Diversity is a relatively new term and planners' understanding of it is clouded by unfamiliarity with diversity issues
- Issues about diversity and planning are not well understood or a priority in planning practice and procedure
- Planners' lack knowledge of where to get information about planning and diversity and expect that national and local government, the RTPI and equalities organisations will be the main providers of information
- The biggest difficulty for planning officers is not knowing how to relate planning to diversity issues, which is not surprising because there is currently little advice on this topic
- In defining diversity, most planning authorities attach the term to a range of discrete groups, such as disabled people, women, BMEs, and older people
- Often diversity is defined solely in relation to race, with little recognition of diversity in the wider population or indeed within BME communities
- The knowledge that LPAs have of diverse groups is dated and likely to perpetuate policies that are problematical
- Most local authorities provide some training on diversity issues, but only a minority provide training on the interrelationships between planning and diversity
- Some LPAs are of the view that diversity issues are not appropriate planning matters
- Planners in rural LPAs, or places where there is a perception by officers of a more or less homogenous population, are unlikely to see the purpose of planning for diversity
- There is a view that strategic planning issues are neutral to diversity issues as they are too far removed from 'people based issues'
- Different definitions and understanding of diversity are used within local authorities and there is a lack of dialogue between strategic parts of authorities and service departments

Introduction

3.1 Knowledge and understanding of the term diversity is important in relation to guiding the development of plans and policies. However, as this part of the report will suggest, diversity is a relatively new term and planners' understanding of it is clouded by unfamiliarity with diversity issues. The relative absence of information or advice, to enable planners to be guided on what ought to be the focus of concern in relation to dealing with diversity issues, is also a problem. In seeking to amplify these, and related points, this chapter is divided into four. First, the chapter provides an overview of planners' understanding of what diversity is. Second, it considers how far training is addressing planners' lack of knowledge of diversity issues. Third, it notes where diversity issues are being resisted, and how best diversity might be absorbed into the policies and practices of planning departments. Finally, the chapter concludes by suggesting ways in which knowledge and understanding of diversity, and the issues it seeks to address, can be developed.

Defining what diversity is

- 3.2 The general feeling conveyed by questionnaire respondents is that issues about diversity and planning are not that well understood or a priority in planning practice and procedure. At one extreme are those officers who are puzzled about the term diversity. For instance, one officer said, 'what do you mean by diversity'? For another, 'this is the first time I have come across the term diversity. I assumed at first glance that it was to do with nature conservation'. For others, diversity issues are not important in their authorities, or as an officer commented, 'diversity has not been perceived as a major issue to date'. Others concurred and, for an officer in a large metropolitan area, 'we don't know...what the diversity issues are'. This view was more common than not with other respondents variously suggesting that 'diversity is not a significant issue', 'diversity issues are not generally regarded as a relevant priority', and 'diversity is not a word that features much and you won't find many references to it in the planning documents'.
- 3.3 In seeking to find out about what planning and diversity issues are, officers look towards a variety of sources. The majority have the expectation that national and local government, the RTPI, and equalities organisations will be the main providers of information yet, as table 1 shows, less than half of respondents use such channels for information and a significant proportion have never bothered to look. A typical comment from one officer was 'I haven't checked these out'. While this might indicate an indifference to the issues on the part of planning officers, comments from respondents suggest that they lack knowledge of where to get information about planning and diversity. Thus, officers variously said that it is 'difficult to find diversity references', 'I have little knowledge of these', 'people are often not

aware of the existence of these publications', and, 'I do not recall any advice addressing diversity issues'.

Table 1: Where do LPAs find information on diversity and planning?

	Yes No (%)	No No (%)	Haven't looked No (%)
National government	99 (47.4)	19 (9.1)	91 (43.5)
Local government	71 (36.2)	28 (14.3)	97 (49.5)
RTPI	108 (50.7)	14 (6.6)	91 (42.7)
Equalities bodies	91 (43.1)	21 (10.0)	99 (46.9)
Other	23 (29.9)	4 (5.2)	50 (64.9)

Source: Authors' survey, 2003

3.4 The biggest difficulty for planning officers is not knowing how to relate planning to diversity issues. This is not surprising because there do not appear to be any documents, advice notes, etc. on this specific topic. In particular, survey respondents concurred in noting that diversity issues are not easy to define or to respond to in practical policy terms. Thus, for a development control officer, 'PPG's are clear about physical access and planning and we can address these. It is more difficult in relation to issues of social inclusion and diversity'. Others concurred and suggested that they have little knowledge of much coming through from the ODPM about diversity issues. For one respondent, well it's difficult to find references to these in government advice. Gender issues are not properly dealt with by the planning system'. For another, 'diversity is so vague'.

3.5 In defining diversity, most planning authorities attach the term to a range of discrete groups, such as disabled people, women, BMEs, and older people. For instance, as the Head of Local Planning in one of the case studies said: 'issues about diversity are vague and look at issues about race and gender'. Here, the respondent is defining diversity as part of a 'special interest' group, as something that relates to particular segments of the population. For one interviewee, an employee of an equalities organisation, the 'special needs' approach to diversity is problematical:

It is easier or just traditional to invoke stereotypes of building users that exclude and then to tack a special needs provision on rather than to accept that inclusive design is about designing for a diverse population.

3.6 Another view was that too often diversity is defined solely in relation to the needs of BMEs, with little recognition of either the existence of other, non ethnic, categories, or of the diversity contained within the BME groups themselves. The Head of a Regeneration unit in a London borough said that 'I use the term diversity in relation to BMEs...it's about making the most of their skills and talent and getting rid of social exclusion'. Likewise, another respondent commented:

diversity is used as a substitute for race... race is higher up the political agenda for a number of good reasons - gender within race often disappears. Planners think 'oh God we must consult with BME groups' – where are the leaders of the community – in many respects the leaders are going to be men

- 3.7 Some felt that the knowledge that planning authorities, and related organisations, have of diverse groups and their needs is dated and likely to perpetuate policies that are problematical. For instance, one key actor respondent felt that planning policies were rarely sensitised to some of the contrasting land use needs of men and women. As she said: 'initiatives are not targeted at the separate needs of men and women. There is still a gap between intentions and implementation and implementation and evaluation'. The most negative comments came from those concerned with ageing:

The planners at ODPM, are very old fashioned in their thinking of older people. In housing, for example, you still hear them talking about staying put and moving on which is a dated agenda.

- 3.8 Other key actors felt that there was little or no knowledge of those, such as asylum seekers, at the extreme margins of society. Thus, one respondent spoke of asylum seekers as the invisible people in society who no one deals with: 'their poverty and lack of access to work limits their lives in many ways, they need at least spaces to go and be together, spaces that can be accessed without cost'.

Towards an understanding of diversity

- 3.9 The questionnaire revealed that most authorities (64%) provide some training on diversity issues, but only a minority (13.1%) on the interrelationships between planning and diversity. As one officer suggested, in relation to training on planning and diversity, 'we do not have any regular training on these issues'. For another, 'we carry out very little in-house training on planning issues...it should be provided through RTPI events'. Others felt that training ought not to be specific to planning and diversity, or as a respondent suggested, 'any training should be in the context of corporate equalities strategies...there's no need to separate out planning as the issues are generic'. Of those authorities that do provide general training on diversity issues, then, issues about ethnicity, gender, disability, faith groups, and travellers are most likely to be covered. Of less importance is training related to children, asylum seekers or refugees, and gay and lesbian people.
- 3.10 Of those officers that responded to the question about how far training had improved their understanding of planning and diversity issues, then, the largest proportion (38.9%) felt that it had made little or no difference to them. For one officer, 'formal training may not be the ideal method', while another respondent was of the opinion that 'surely educated people should already recognise these issues'. Others felt

that training was wasted given difficulties in staff retention or, as an officer said, 'there is also a problem of high staff turnover'. Some, however, value the training experience and 45.9 % of respondents felt that training had either significantly or very significantly improved their understanding of planning and diversity issues. Thus, as a respondent noted, training 'highlights what the issues are and what role the land use planning system has'.

- 3.11 Some questionnaire respondents identified what they perceive to be gaps in training provision. For one officer, the problem is lack of knowledge of how to relate issues about diversity to land use matters. As s/he said, 'we need guidance on how diversity issues other than the well known ones...can be treated as a material land use or spatial planning issue and the type of policies, proposals, development control criteria or conditions that are robust and practical and defensible in law'. This was a common observation, or, as another officer noted, 'in terms of policy writing it is easy to develop policies addressing disability and accessibility. However, it is more difficult to develop policies specific to women or religious groups which are relevant (and there is little best practice to draw on)'. Likewise, an officer said that there is a 'need to focus on what planning can achieve', which, for another respondent, requires 'practical good practice examples'.

Resisting the diversity agenda or developing the knowledge base?

- 3.12 Some respondents to the questionnaire are of the view that diversity issues are not appropriate planning matters or, as an officer said, 'planning is land use based, not cultural or gender based'. Others were dismissive of a focus on diversity because planning, in their opinion, already responds to all interests. Thus, for one respondent, 'diversity is a flawed concept. It is not necessary to seek supposed problems and representations and disadvantages. The Planning Service serves the whole community not stratified segments of it'. Some authorities did not welcome diverting planners' time into developing their knowledge of diversity issues: 'small authorities are in serious danger of failing to provide the main functions because of excessive concentration on the widest possible range of matters which will not always be relevant'. Likewise, another officer suggested that 'the planning function here has enough problems with the workload; non-statutory work is kept to a minimum'.
- 3.13 Respondents from rural areas, or places where there is a perception, by officers, of a more or less homogeneous population, are unlikely to see the point or purpose of planning for diversity. Thus, one officer said, 'diversity issues are not a real problem for planning in a rural district', a view shared by another: 'most areas of diversity are not significant in this large rural area'. This view was evident in County Councils dealing with structure or strategic planning issues. Some

respondents here felt that strategic work was too far removed from 'people-based' issues: 'Planning at the strategic level tends to be neutral to diversity issues. They become more 'real' at the local level'. Others concurred: 'we are a mineral and waste development control authority only and therefore these questions are of little relevance'. Likewise, one officer said that 'Structure plan work doesn't tend to go into detail on diversity issues', while, for another, 'it's hard to make strategic planning matters interesting and relevant to specific groups'.

- 3.14 Such views were in the minority and others were more concerned to see planners' knowledge of diversity issues be enhanced. In particular, some were of the view that diversity issues should not be seen as just 'a planning matter'. As one officer said: an understanding of diversity needs to be an inherent, not separate, consideration. Therefore it needs to be an integral part of a councils' approach to all services rather than a planning consideration'. Others felt that a holistic approach to diversity is required. For one officer, 'there should not be a need for distinctive diversity policies in the UDP – the policies ought to reflect diversity objectives', a view shared by others. Thus, for one officer, 'you will note that I am pretty cynical about 'diversity'. The planning system should take account of the needs of its communities in providing a framework for development'. One respondent even suggested drastic action: 'why not consider forcing us to consider these issues...there is an opportunity to do so with the new legislation'.
- 3.15 Some respondents felt that there was a lack of dialogue about diversity issues between strategic parts of local authorities and officers in service departments. Different individuals and some service departments were using different definitions and understanding of the term. For one respondent, a Head of Regeneration in a London borough, 'no one uses the term in a clear or consistent way...it's difficult to know what it means'. She amplified by suggesting that 'diversity is talked about in a strategic way but this doesn't get through to the grassroots...so, it's mentioned by members and finds its way into strategic documents on things like the public realm and community development'. However, she noted that the borough was too hung up on sustainability issues and that 'diversity had not permeated the planning department'.

Conclusions

3.16 The research has identified a series of conclusions, which are set out below:

- Planners' knowledge of diversity issues is vague, partly because there is little or no guidance or training in relation to diversity
- Planners are not that familiar or comfortable with the term 'diversity' and most do not really know what it means
- Planners tend to define 'diversity' in relation to 'special needs' groups, such as women, disabled people, and BMEs. In particular, diversity issues appear to be seen, by planners, as closely linked to issues of race
- Planners are not that aware of where they can find out about diversity issues and are of the opinion that organisations like the ODPM and the RTPI, are not providing much by way of guidance on planning and diversity
- Information and guidance on diversity and planning is crucial because planners do not know how to relate land use matters to the needs of diverse members of the community, except in the most obvious of cases (e.g. wheelchair users access to public buildings)

Chapter 4

Diversity, Planning Policy and Plan-Making

Key Findings

- Just over half of LPAs reported that they have diversity policies in their development plans, however, policies focus on the needs of specific groups and diversity is rarely mentioned
- Policies for disabled people are most common in development plans and generally focus on physical access to buildings
- Impact appraisal of plans and policies on particular groups is weak and under developed in development plans
- A large minority of LPAs report that they do not consult with key groups in the local community
- There is evidence that some authorities are trying to engage hard to reach groups, but good practice is required
- National umbrella organisations have urged planners to think more imaginatively and creatively about consultation techniques to engage a wider cross section of people
- PPGs guide, inform and help frame development plan policy, but a significant minority feel they are unhelpful in providing guidance on diversity, however, there are examples of RPG, which explicitly refer to reducing inequalities and promoting social inclusion
- Good practice advice is required to help LPAs translate diversity into tangible development plan policies, make the connections between diversity and spatial planning and assist with resolving policy conflicts related to diversity
- Strategic corporate policies provide an important steer for the preparation of development plans

Introduction

4.1. This chapter considers the degree to which planning policy and plan-making addresses diversity. It draws upon data gathered in each

component of the research project, but particularly the findings from the questionnaire survey and case studies. The chapter focuses on five key issues that are central to an evaluation of the current practice of development plans and the scope for improvement. The issues include, the extent to which diversity is addressed in development plans; the extent to which LPAs respond to advice in PPGS on planning policy; the role of corporate policy drivers in addressing diversity; the extent to which impact appraisal is undertaken by local authorities; and the practice of consultation with communities in the development plan process.

Addressing diversity in development plans

- 4.2. Despite the general feeling conveyed by planning officers in local authorities that issues about diversity and planning are not well understood, just over half (56.4%) of all LPAs responding to the questionnaire, reported that they had policies on diversity in their development plans. However, there still remain approximately 41.7% of LPAs that do not include diversity policies in their development plans.
- 4.3. However, where LPAs report references to diversity in their development plan policies, diversity is rarely mentioned, and where it is there is little definition of what this means in practice. For some, the preferred term is inclusiveness, which as one officer points out is an attempt to 'take on board the social inclusion agenda of New Labour' and more generally new duties of promoting well being'. It could be argued that, on occasions, social inclusion appears to be used as a proxy for diversity and equalities. The most common references in the development plan are to specific groups, most notably disabled people, gypsies and travellers, and then children and older people. Few LPAs refer to other groups, such as faith groups and women, and some groups, such as gay and lesbian people and asylum seekers, are noticeable by their absence in all but a few authorities.
- 4.4. Policies, which refer to the needs of specific groups include the provision of childcare facilities in order to 'enhance opportunities for women and BMEs to obtain further employment or education'. Some LPAs recognise that BME communities have distinct cultural identities and different social needs and have developed policies that 'will endeavour to address the diverse planning requirements of ethnic communities in the borough'. However, the policies do not state explicitly what those specific requirements might be in relation to the specific community in that local authority. For example, housing improvements, larger housing and house extensions, male and female employment opportunities, places of worship and community facilities and so forth.
- 4.5. Policies for disabled people are the most common reference to specific groups in most development plans, in particular physical access to

buildings. A few LPAs recognise that disability is not just about mobility, but also about visual hearing and intellectual impairment. Some LPAs have prepared Supplementary Planning Guidance (SPG) on disabled access but others suggested that if they were to produce SPG on residential design and shop fronts they 'would prefer to see access for disabled people fully integrated' within such guidance'.

Responding to PPGS

- 4.6. PPGs help provide a framework for development plans and local planning policy in LPAs. They also provide an important source of advice for development control, particularly where development plans are out of date or do not contain relevant policy advice, for example, s106 contributions. Their content is significant in that it guides, informs and frames decision-making and implementation at the regional, sub-regional and local level. However, for the majority of LPAs, PPGs currently provide little in the way of advice about planning and diversity issues, (see chapter 7). For one officer, the PPGs are disappointing, because 'there are no explicit references to diversity issues - they are dated and in need of revision'. Others concurred, with another officer noting that 'I've never noticed any comment on diversity issues in PPGs'. However, there are examples of Regional Planning Guidance (RPG), which explicitly refers to reducing inequalities and promoting social inclusion. For instance, the London Spatial Strategy and the South West RPG.
- 4.7. For some, PPGs and related guidance, are problematical because they do not provide much practical advice about how to translate diversity issues into tangible planning policies. As an officer said, there are 'no examples of best practice that can be learnt from'. Likewise for another officer, 'PPGs don't make a strong link between land-use planning and diversity.... They don't move into diversity culture or the fact that a diversity of solutions can be difficult to handle in planning terms'. All respondents concurred in noting that 'diversity issues are not easy to define or to respond to in practical policy terms'.
- 4.8. This is a disappointing response since equalities policies have been incorporated in several local plans since the mid-1980s, e.g. Sheffield, Leicester, Manchester, Lambeth and Camden. Clearly, over the last twenty years some LPAs have made the connections between diversity and spatial planning, but good practice is not being disseminated. Several planning officers indicated they would: 'welcome advice on diversity that could inform implementation of PPGs. In particular good practice on inclusive housing and lifetime homes would be very helpful'. Some felt however, that the relative dearth of guidance should not be used as an excuse for inaction: 'PPGs are not helpful because it is not there in any meaningful detail in terms of how to respond. But its absence should not prevent a LPA from taking its own action in these areas'.

- 4.9. Despite the lack of explicit references to diversity in national policy guidance, respondents suggested that PPGs have plenty of potential to direct planners towards positive responses to diversity issues, and may well be the best route to achieving a planning system that addresses the diverse needs of the community. As one planning officer suggested: 'the PPGs would be a good route to go through if you want to encourage planners to tackle diversity.... They will take notice of them'. Another officer noted that, 'if a strong message came through the PPGs, that diversity issues are okay, this will encourage planners to use them'.
- 4.10. It is also important that PPGs address the policy conflicts raised by diversity and planning. In particular, planning officers highlighted the policy tensions between conservation and access for disabled people. It should be possible to achieve a solution, which satisfies the access requirements under the DDA and at the same time respects the historic integrity of the building. Other policy conflicts seldom addressed by the PPGs, include policies which seek to reduce car dependency but fail to recognise the travel needs of disabled people.

Corporate policy drivers

- 4.11. Local authorities now have a wide range of strategic corporate policies and the Community Plan provides the overarching framework for many of these strategic policies. The Head of Local Plans in one authority reported that

'the Community plan will provide the overarching policy framework for the new LDF. The LDF will also relate closely to a range of corporate strategies, particularly affordable housing. It is for the LDF to extrapolate the land use planning implications'.

- 4.12. The requirements of Best Value, the duty to prepare Race Equality Schemes, Corporate Health Indicators and the like, are beginning to provide the strategic context for the preparation of development plans and planning policy. However, planning officers were ambivalent about their relevance. For some planners, national guidelines and strategic corporate policy, are felt to be helpful or very helpful, in informing planners (49.5%), although 'not conclusive', while for others, 'they have been successful in providing corporate information'. It is disappointing that one respondent commented: 'the (corporate/national) guidelines are not relevant to planning policy'. However, a more typical response was that the guidelines are not 'terribly informative' and that they require officers 'to actively seek information and then it doesn't necessarily answer the question'. Generally, most respondents were non-committal about their usefulness, possibly because they had little or no knowledge of them.

Table 2: How helpful is national guidance in enabling local authorities to address issues of diversity

	Local authorities
	No. (%)
Very helpful	6 (3.3)
Helpful	84 (46.2)
Neither helpful or unhelpful	77 (42.3)
Unhelpful	14 (7.7)
Very unhelpful	1 (0.5)

Source: Authors' survey, 2003

4.13. The strategic corporate context provides an important framework for development plans and often equality, diversity, social inclusion and disadvantage are key corporate objectives for many local authorities, and indeed at the heart of some local partnerships. However, the translation of equality and diversity objectives into strategy and policy within service departments, such as planning, is mixed. Most notably, there is a focus on meeting the needs of BMEs and disabled people, which is underpinned by compliance with the statutory duties under the legislation. There is also a focus on consultation and engagement with the community. Although planning officers described these strategies as providing an effective framework for the development of diversity and equality policy, they were also perceived by some as 'further burdens on already stretched departments'.

Appraising impacts

4.14. In discussion with equalities organisations, there was a call for better analysis of plans and policies in the form of gender proofing, equality proofing, together with disaggregated data and analysis of strategies to determine who benefited from resources. Although the use of the PAET guidelines to assess the potential impacts of strategic options on different groups in society has been advised in PPG 11, Regional Planning, the survey revealed that very few LPAs assess the impact of their development plan policies or SPG on different groups. As table 3 shows, just under 8% of respondents assess the impact of development plans on women, a figure that declines to 2% in relation to those authorities that assess the impact of SPG on women. Marginally more LPAs (12%) assess the impact of the development plan on older people, travellers (18%) and disabled people (23.4%). These figures are all much higher in contrast to the assessment of impact of SPG on the respective groups.

Table 3: Has your LA assessed the impact of the development plan(s)/SPG on different groups?

	Number who had assessed the impact of DP	Number who had assessed the impact of SPG
Women	16 (7.8)	2 (1.5)
Older people	27 (12.8)	4 (3.0)
Faith Groups	10 (5.1)	1 (0.8)
Ethnic Groups	22 (10.7)	1 (0.8)
Disabled People	51 (23.4)	14 (10.6)
Gypsies and Travellers	38 (18.0)	3 (2.3)
Asylum seekers/refugees	5 (2.5)	1 (0.8)
Gay/lesbian/bisexual	6 (3.0)	1 (0.8)
Children	24 (11.7)	4 (3.0)
Other	3 (2.5)	2 (2.5)

Source: Authors' survey, 2003

4.15. The impacts of the development plan on different groups was largely assessed by talking to representative groups, officer judgement and feedback from specialist officers. Very few authorities had commissioned research, user satisfaction surveys, focus groups or citizens panels as a means to gauge impacts of the development plan and/or SPG on different groups. One officer admitted that impact appraisal is 'a really weak area'. Under the Best Value regime all local authorities must carry out user satisfaction surveys bi-annually, but this is as far as it goes. As an officer noted, 'with a specific policy we can get close to the local people, but we don't gauge outcomes of policies in a general sense. It is something we can easily do'. Other officers envisaged that the sustainability appraisal of the development plan would be used to identify diversity issues although it was not an explicit requirement, therefore it is difficult to see how this would happen in practice.

Consultation

4.16. In the preparation of the development plan, a large minority of LPAs do not consult with key social groups in their localities. Table 4 shows that just over a third of authorities never consult with women's groups (34.7%) or children (36.9%), and a high proportion never consult with asylum seekers (78.6%) or gay people (71.4%). The most likely groups to be consulted are disabled people and BME communities, once again this may reflect legislative duty and compliance.

Table 4: In preparing Development Plans/SPG, do local authorities consult with different groups?

	Always No. (%)	Often No. (%)	Sometimes No. (%)	Never No. (%)
Women	49 (28.8)	18 (10.6)	43 (25.3)	59 (34.7)
Older people	57 (32.0)	27 (15.2)	47 (26.4)	46 (25.8)
Faith Groups	46 (25.4)	29 (16.0)	59 (32.6)	47 (26.0)
Ethnic Groups	63 (33.9)	23 (12.4)	45 (24.2)	55 (29.6)
Disabled People	112 (55.7)	39(19.4)	36 (17.9)	14 (7.0)
Gypsies and Travellers	57 (30.2)	33 (17.5)	55 (29.1)	43 (22.8)
Asylum seekers/refugees	11 (6.9)	5 (3.1)	14 (8.8)	125(78.6)
Gay/lesbian/bisexual	19 (11.8)	8 (5.0)	18 (11.2)	115 (71.4)
Children	26 (14.8)	20 (11.4)	65 (36.9)	65 (36.9)
Other	9 (20.9)	6 (14.0)	5 (11.6)	23 (53.5)

Source: Authors' survey, 2003

4.17. Although some LPAs reported they had received a wide response to their consultation, they were often the 'usual suspects' and for many LPAs consultation is a problem. As one respondent said, 'it is difficult to identify groups and their representatives to consult and in obtaining responses'. Some authorities feel that they have made extensive efforts to consult a wide range of interests and specifically engage 'hard to reach groups'. 'Hard to reach' groups were generally identified as older people, younger people, disabled people and BME communities, although some authorities had also targeted women and lesbians. In some cases the driver for a more inclusive approach to participation was corporate strategy. The case studies revealed that quite often groups would be selected, or contacted, via 'equalities colleagues' in the council and existing networks, fora and organisations. Where LPAs drew on this expertise the consultation appeared to be effective in engaging groups traditionally under represented in the planning process.

4.18. Where consultation does take place with specific sections of the community it tends to be with easy to identify groups, such as older people and disabled people, who have well established national and local networks. One officer said, 'we find that women and older people are well represented in responses to consultations', whereas some groups are considered more difficult to engage with. For example, one respondent noted that, 'we have found that attempts to involve children and young people have a mixed reaction. Not all young people or other groups seem to be interested in planning issues'. Likewise, another officer suggested that 'difficulties have been found when consulting as often only some groups reply'. Others were not sure how far land use issues related to specific groups: 'disabled people, gypsies, older

people, and children have clear needs, which have special and land use implications. It is not easy to identify the land use implications of sexual orientation'. Some planning officers suggested that groups' apathy and disinterest in planning did not lead to meaningful consultation: 'It is very difficult to interest people in general planning policy issues..... most of the groups... tend to have other priorities'. This was a common observation with another officer noting that 'there's a feeling of lack of relevance of planning system to the daily life of most folk irrespective of the sub -group'.

- 4.19. National umbrella organisations urged planners to think more creatively and imaginatively about consultation techniques to engage a wider cross section of people. There is evidence that some LPAs are using outreach, focus groups, workshops and facilitators, but approaches to consultation largely reflect the local context, corporate objectives and priorities. The planning proposals outlined in the planning green paper, identify consultation and engaging the community as a key priority for modernising planning, but this research suggests that progress may be slow and uneven unless stronger direction is given in PPGs, underpinned by good practice guidance.

Conclusions

The conclusions are set out below:

- Development plans do contain policies on diversity, but it is rarely defined and usually relates to specific groups, most notably disabled people, gypsies and travellers
- LPAs require practical advice on translating diversity issues into planning policies and resolving policy conflicts raised by diversity and planning
- Increasingly strategic corporate policies provide important over arching frameworks for plan-making and planning policy
- There is a need for better analysis of plans and policies in the form of diversity proofing and the assessment of impacts on different groups in the community
- Consultation is a key priority for planning, but progress may be slow and uneven unless stronger direction is given in PPGs

Chapter 5

Development Control and Diversity

Key findings

- Development control officers find it difficult to make the connections between development proposals and diversity, other than in relation to physical accessibility, where there is greater sensitivity to the access implications of proposals. The lack of clear guidance in PPGs compounds the problem
- Spatial impacts of proposals are generally limited to neighbours as interested parties and consultation with diverse groups in the local community is patchy
- Development plan policies on inclusiveness are considered aspirational rather than practical
- Training appears to focus on that which is legislatively necessary, such as disability, therefore it is not surprising that lack of knowledge and awareness are perceived as major barriers to addressing diversity and planning
- Both national and local equality organisations (with the exception of disability) appear to lack knowledge of, and confidence in, making the connections between planning and diversity
- There appears little awareness of the implications of the post – Macpherson agenda for development control and there is little recognition that organisational cultures can unintentionally result in institutionally discriminatory practices
- Good practice in the Planning Inspectorate illustrates how training within a supportive organisational framework, can sensitise professionals to the potential for procedural injustice
- National planning organisations feel that the planning system delivers less for those who interact less well with it and thereby exacerbate social inequalities

Introduction

5.1. This chapter considers the degree to which the practice of development control (DC) is sensitive to diversity. It draws upon data gathered in each component of the research project, but particularly the case studies. The chapter is organised around three issues, which are central to an evaluation of the current practice of development control and the scope for improvement: considering the impacts of development proposals in relation to diversity; the significance of legislation and policy guidance; the sensitivity to indirect and institutional discrimination.

Assessing the impacts of development control within a framework sensitive to diversity

5.2. It appears that development control officers find it difficult to make the connection between the specific, concrete nature of a given development proposal and the general principle of respecting diversity, other than in relation to physical accessibility. It is plausible to suggest that this is what underlies the questionnaire survey finding that in assessing planning applications most local authorities do not routinely consult with different groups. LPAs appear to view development proposals as having spatial impacts, and hence initially define interested parties in spatial terms, for example, neighbours, where in one of the case studies this approach was strictly applied. In a sense the figure of 64% saying they do not consult with BME groups could be regarded as surprisingly low. Where diversity issues are raised in relation to planning applications (as reported by 36.8% of respondents) the diversity considerations typically relate to the users/beneficiaries of the development (hostel users, place of worship, travellers..) and the planning aspect is still seen as essentially about the management of externalities, such as noise and disturbance, etc.

5.3. There appears to little weight given to the idea that a development may be viewed differently by, and have very different impacts on, different social groups. Equally, there is little appreciation that these groups may wish to comment on the principle of a development, even when there may be few or no individuals directly affected at the time the application is made. Clear local plan policies could help DC officers make these connections, but in one case study the DC officer interviewed considered the plan policies on inclusiveness to be 'aspirational' rather than practical.

Table 5: In considering planning applications do local authorities consult with different groups?

	Routinely No. (%)	On occasions No. (%)	Applications in particular localities No. (%)	Local group not known No. (%)
Women	11 (7.7)	12 (8.5)	9 (6.3)	101 (71.1)
Older people	11 (7.4)	27 (18.1)	14 (9.4)	87 (58.4)
Faith Groups	8 (5.4)	26(17.6)	20 (13.5)	85 (57.4)
Ethnic Groups	9 (6.1)	20 (13.5)	13 (8.8)	95 (64.2)
Disabled People	63 (32.5)	68 (35.1)	10 (5.2)	41 (21.1)
Gypsies and Travellers	9 (5.6)	46 (28.8)	15 (9.4)	80 (50.0)
Asylum seekers/refugees	4 (2.8)	6 (4.2)	5 (3.5)	117 (82.4)
Gay/lesbian/bisexual	6 (4.1)	6 (4.1)	4 (2.8)	120 (82.8)
Children	4 (3.0)	6 (4.4)	9 (6.7)	107 (79.3)
Other	3 (5.0)	2 (3.3)	3 (5.0)	48 (80.0)

Source: Authors Survey 2003

- 5.4. There is more sensitivity to access implications of proposals and often development control practice identifies proposals where access is an 'issue'. However, the focus is generally on access in relation to specific proposals, rather than useability across the board, where access groups are routinely consulted as interested parties in every application. The lack of clear advice and illustrations in PPGs compounds the difficulty of connecting development proposals to principles of respecting diversity, as was noted by a number of interviewees, national and local. Nor is it helpful in this regard that 'equality professionals' (nationally and locally, and with the exception of disability groups) usually have little idea of how development control relates to their particular concerns.
- 5.5. If development control officers are encouraged to develop a greater sensitivity to diversity, then it will be important to ensure that this becomes a framework within which they undertake their work, rather than simply another material consideration to be potentially, traded off against others. One DC interviewee argued that new PPG advice on diversity, even if clearly specified, would still be only one concern among others, to be applied and argued over in specific cases. He also feared that too much was being asked of the planning system in terms of achieving multiple objectives, some of which amounted to 'social engineering'. There are echoes here of a concern of one of the national 'user' interviewees, who complained of 'inflation' in the planning system – that every application had an s106 attached, for example. Any national guidance must anticipate, and defuse, these kinds of concerns.

Legislation and national guidance

- 5.6. The significance of legislation is borne out by the evidence on training. Training appears to focus on that which is legislatively necessary, and there appears to be little doubt that planners are more confident dealing with access issues than any other aspect of diversity. Similarly, the Race Equality Schemes required by the Race Relations Act, 2000, are likely to increase the proportions of LPAs monitoring their planning applicants by ethnicity, the case studies illustrate. There are also some grounds for optimism that the spur of legislation may be encouraging authorities to go a little beyond what is legally necessary. Thus in one case study, monitoring is being introduced as a result of the Race Relations Amendment Act, 2000, but the opportunity is being taken to introduce additional monitoring categories, which are felt to be important locally. Similarly, in another case study, attempts are being made to consult with older and younger people, as well as with access groups.
- 5.7. The existence of legislation cannot be the whole story in relation to these kinds of innovation, for there has been legislation on sex discrimination and racial discrimination since the 1970s, but little sensitivity to race equality or gender equality in planning. Crucially, however, for many years neither government nor the relevant equality organisations have made connections between the legislation and aspects of planning. Moreover, as stated earlier, interviews with national and local equality organisations revealed that - with the exception of disability organisations- they lacked knowledge of, and confidence in discussing, the planning system. When national policy steers are clear, action is more likely. There is clear evidence that in one case study, for example, the neighbourhood renewal/social inclusion agenda has been influential in shaping corporate and planning priorities and modes of working.

Sensitivity to the possibility of indirect and institutional discrimination

- 5.8. There appears to be little awareness of the implications of the post-Macpherson agenda for development control. This conclusion is based on the fragmented nature of planning authorities' responses to the diversity agenda. In one of the case study areas a respondent from the local Race Equality Council said that in that area only the police were taking the post-Macpherson agenda seriously. Organisations such as the local authority were paying lip service to it. Whatever the truth in that particular case, there does seem to be a lack of urgency in the planning service about the possibility that systematic injustice is being perpetrated. Hence, monitoring of planning applications appears to be seen as a discrete exercise, divorced from a review of other practices, or training. When monitoring is undertaken – as in one of the case

studies – the data remains unused. It is worrying that in another case study, where political support for cutting edge initiatives such as mainstreaming is apparently high, a poorly regarded system of ethnic monitoring has been discontinued rather than modified/improved.

- 5.9. National planning interviewees stated that they felt the planning system tended to deliver less for those who interacted less well with it, and thereby exacerbated social inequalities. These same respondents thought that planners did not have prejudicial stereotypes of different groups, but that leaves open the possibility of unquestioned views about 'desirable' or 'normal' ways of life. There is little doubt that with the advent of Best Value and other forms of scrutiny, development control divisions (and managers) have become sensitised to the idea that a division will have a distinctive organisational culture, and that this has an impact on its work. In their different ways, all the case study authorities alluded to this. One case study made explicit reference to having an 'open' culture. But there remains no recognition – as there slowly appears to be in the police, for example – that organisational cultures, often entirely unwittingly, can be part of institutionally discriminatory practices.
- 5.10. The experience of the Planning Inspectorate illustrates how training, within a supportive organisational framework, can sensitise professionals to the potential for procedural injustice. The returns on 'Monitoring incidents of discrimination' provide evidence of inspectors' being extremely sensitive to a range of potential barriers to full participation in the planning process (by no means restricted to those legislated about), taking these seriously (insisting that they be addressed, for example) but being practical in how they did so, so that the central purpose (hearing an appeal, or whatever) was not overshadowed. So, for example, they are constructive in assisting participants at an inquiry who have young children with them.
- 5.11. Case study evidence is that training in local authorities is patchy, in one authority confined to the DDA, which as a statutory duty has priority and status, in another to race awareness, again, there is a legal context here that may well be significant. Yet over 50% of respondents to the questionnaire acknowledged a lack of awareness and knowledge of diversity issues among planning officers as a major barrier to relating diversity better to planning .
- 5.12. The lack of training in relation to diversity and planning, other than aspects of the DDA, is something which needs to be addressed if any change is to be achieved in the level of understanding and confidence in development control.

Table 6: What are the main problems in seeking to respond to diversity issues?

	A significant problem No. (%)	A problem No. (%)	Not a significant problem No. (%)	Not a problem No. (%)
Lack of time	66 (34.9%)	63 (33.3%)	35 (18.5%)	25 (13.2%)
Lack of commitment	7 (3.9%)	45 (25.1%)	75 (41.9%)	52 (29.1%)
Councillors lack of awareness	12 (6.9%)	58 (33.1%)	70 (40%)	35 (20%)
Lack of finance and resources	70 (37.6%)	58 (31.2%)	38 (20.4%)	20 (10.8%)
Lack of awareness amongst planning officers	17 (9%)	68 (36%)	73 (38.6%)	31 (16.4%)
Lack of knowledge amongst planning officers	19 (9.9%)	78 (40.8%)	63 (33%)	30 (15.7%)
Lack of support from councillors	8 (4.7%)	43 (25.3%)	83 (48.8%)	35 (20.6%)
Lack of guidance from central government	50 (25.5%)	76 (38.8%)	48 (24.5%)	21 (10.7%)

Source: Authors' survey, 2003

Conclusions

5.13. Several points arise from the research in relation to development control:

- Development control officers find it difficult to make the connection between the specific, concrete nature of a particular proposal and the general principle of respecting diversity/promoting equal opportunities etc, other than in relation to physical accessibility
- Representatives of equality organisations (other than disability organisations) find it difficult to make the connections between equality and diversity and spatial planning, which is problematic for consultations on development proposals
- That to the extent they envisage diversity being addressed in DC, officers see it as another issue to balance; they, and some users, are concerned that the system is becoming too complex as it is being asked to address sophisticated policy objectives
- Legislation is a powerful, if crude, influence on the practice of development control in relation to process the evidence suggests that planning authorities do not fully appreciate the possibility of institutional discrimination

Chapter 6

Diversity, Social Exclusion and Regeneration

Key findings

- Regeneration is more frequently delivered through local partnerships, composed of individuals drawn from a diverse range of backgrounds and interests. These partnerships are often required to involve and engage local communities.
- As such, there is great potential for regeneration partnerships to address issues around planning and diversity.
- However, while such partnerships are responsible for planning and delivering significant change within their area, partnership members are not required to have any formal planning expertise, nor are they required to have any formal contact with the LPA.
- There is a need, therefore, for better training for local partnerships and for more formalised contact between partnerships and planning authorities.

Introduction

6.1 This chapter considers the degree to which regeneration policy and practice are sensitive to issues of diversity. The chapter is organised around five issues, which look at the potential for regeneration partnerships to address diversity, and the constraints on this potential experienced in practice: the use and definition of 'social exclusion'; involving communities in regeneration; the potential for regeneration partnerships to address issues of diversity; the reality of diversity and regeneration; and the relationship between partnerships for regeneration and local planning authorities.

Social Inclusion

6.2 'Social exclusion' is one of the key concepts driving the regeneration agenda. Although the Government's definition of social exclusion encompasses a great number of problems, being concerned with crime, unemployment and poor health, evidence from national policy guidance would suggest that, for central government at least, the term 'social exclusion' refers primarily to exclusion from education and paid employment. For central government, paid work represents the best

means of reconnecting the socially excluded with organisations which can promote inclusion and prevent material poverty.

- 6.3 At the local level, however, there is evidence that the term has very different connotations. It is frequently used within local planning and regeneration guidance to refer to diverse groups within communities who have not traditionally been involved in regeneration activity, such as the unemployed, children, asylum seekers and refugees, and groups within BME communities (Asian women, for example). One case study has used social exclusion to refer to groups that the Council believes should be better involved in regeneration activity in the city.

Social exclusion... refers to the institutional, social and cultural structures under which some groups have less of a voice than others, by virtue of their membership of a disadvantaged group... groups can be excluded because of disability, gender, age, work or social circumstances, membership of a religious or ethnic group²

- 6.4 Other case studies have similarly used social exclusion with regards to the physical access needs of the mobility impaired, and access to sporting facilities by young people.

Involving communities in regeneration

- 6.5 Since 1997, the national regeneration agenda has emphasised the need for bottom-up, neighbourhood based approaches to regeneration, and a number of initiatives have emerged which stress the need to involve and engage local communities in decision-making processes (New Deal for Communities, Sure Start, and so on). DETR produced extensive guidance for such community-based partnerships – Involving Communities in Urban and Rural Regeneration (DETR, 1997) – which acknowledged that communities are comprised of many diverse groups.
- 6.6 The manual states that regeneration partnerships should target both spatial and non-spatial communities, such as faith groups and the gay community. However, while recognising the diversity of communities, the manual presumes that communities are united and consensual entities. There may be differences around age and race, for example, but the individuals within a community have the same needs and aspirations, and have a shared vision for regeneration. Significant conflicts within communities are not anticipated, and this is reflected in the tight time-tabling of many regeneration initiatives, which offer little scope for training around bringing together a disparate group of people who need to ‘gel’ together in order to manage a multi-million pound programme for change.

² From page 7 of *Matching resources to Locality, An Area Regeneration Framework for Plymouth*. Prepared by Cooper Simms, May 2001.

- 6.7 The timetables for many regeneration initiatives do not take into account the fact that there may be infighting within a community, and that conflicts can be time-consuming. Several New Deal for Communities (NDC) partnerships, for example, have experienced conflicts between different community factions which have significantly delayed the process of regeneration. There is a need, therefore, for national regeneration guidance to adopt a more realistic view of working with diverse communities in deprived areas.

Inside local regeneration: the potential for addressing diversity

- 6.8 Local partnerships for regeneration have a significant input into planning for a particular neighbourhood. They have access to considerable resources through government grants and match funding, and are required to use this budget to plan and manage significant physical and social changes within their area of responsibility. Such partnerships are arguably ideally placed to address issues around diversity.
- 6.9 Since 1997, government guidance has stressed the need for regeneration partnerships to not only engage with local residents, but to engage with what are known as the hard-to-reach groups within local communities. The DETR guidance *Involving Communities in Urban and Rural Regeneration* stresses the need to involve BMEs, faith communities and young people in regeneration activities. It highlights the importance of involving all groups in the community in all regeneration activities and the contribution that they can make. Specific guidance has been developed, as these groups have often felt that they have been excluded from discussions, or involved in tokenistic ways, or at too late a stage to influence decisions. Regeneration partnerships themselves recognise their inability to engage with these groups, and have sought appropriate ways to do so.
- 6.10 Furthermore, unlike LPAs, such partnerships do not only consult with these groups, but are now required to actively involve a diverse range of people in decision-making processes. Thus, many regeneration initiatives are now led by partnership boards comprising statutory agency representatives, the voluntary and private sectors, and a significant number of resident representatives. In the case of NDC, partnership boards frequently have residents in the majority, giving them the largest share of the vote.
- 6.11 Community involvement is carefully scrutinised, and partnerships can have their funding withheld or even withdrawn if they fail to meet standards of participation. This has driven partnerships to be more creative in their techniques for community involvement, including 'Carnival and Bonfire', community inclusion teams, community

websites, community buses, cultural events, and door to door enquiries. In contrast, local authorities are not perceived to take consultation far enough, and it frequently ends up as an information giving exercise instead of a two-way dialogue.

- 6.12 Regeneration partnerships are, therefore, ideally placed to identify, plan for, and meet the needs of diverse communities. The close involvement of local residents in the regeneration process means that, theoretically, they have access to hard to reach groups in the community that a LPA might find difficult to identify and engage. In one case study, for example, regeneration has been well thought out and widely consulted upon. Efforts have been made to consult with BMEs, disabled people, older people, young people, women, lesbians and gay men. Their Community Strategy 2002-2012 shows similar evidence of consultation and involvement.
- 6.13 The onus to consult and engage local people also provides partnerships with a direct channel to local knowledges and concerns, enabling the development of projects that meet a wide range of local needs. Many NDCs, for example, have made excellent provision for the needs of the older and young people, groups that can be overlooked by planning authorities.

Inside local regeneration: the reality and the constraints

- 6.14 Although there are many opportunities available for local regeneration partnerships to address issues around diversity, the reality is that this potential is not being fulfilled. A key issue of concern is that there is no obligation for partnerships to engage with the diversity agenda. The individuals involved in regeneration partnerships can be considered to be planners of sorts – they have access to resources to plan and manage change – but the reality is that these individuals are not trained planners, they have not been trained in planning practice, and are most likely not aware of, nor are they subject to, the kinds of planning regulations, guidance and advice to which statutory planners must adhere. This has become more problematic an issue since 1997, when regeneration partnerships have been urged to seek some independence from local authorities. Many have sought to distance themselves from local authority control, which in turn places them further from scrutiny by planning authorities.
- 6.15 In terms of planning for diversity, the guidance given to regeneration partnerships is insubstantial, often only dealing with issues around race and racism. However, there is evidence to suggest that even this guidance has been inadequate, and has not been backed up with proper training for partnership members. In the case of NDC, there is a strong commitment to addressing issues around race, which is driven by national guidance.

- 6.16 Many of the NDC partnerships have large BME communities. Existing tensions between white and BME communities are naturally heightened by regeneration initiatives, where diverse and deprived communities are asked to come together to equitably divide resources between them, which has raised suspicions that some groups may benefit at the expense of others. In such situations, it is vital that partnership members are given training and advice as to how to interact with diverse groups of people (particularly around different techniques for involvement and the use of inappropriate language). There is little evidence to suggest that such training has taken place, and some partnerships have struggled to contain community tensions as a result.
- 6.17 On the other hand, some NDC partnerships are operating in areas with only very small BME communities, having a predominantly white culture. Partnerships in these areas do not consider race to be an issue, and have chosen to focus instead on other concerns. There is now some debate, however, concerning the location of asylum seekers and refugees within NDC areas. Many NDCs have little expertise in engaging with such communities, and are finding difficulties not only with engaging, but also with reconciling their involvement with the rest of the community.
- 6.18 Although many regeneration partnerships are led by Boards with a majority community membership, they are not often very diverse in nature. Many Boards are dominated by older activists, with a large number being women. Although partnerships recognise the need to consult with hard-to-reach groups, it is not always clear what this means in practice. Some groups may be hard to reach because local institutions have not proved effective at reaching them.
- 6.19 There is also evidence to suggest that NDC partnerships are so insular and inward-looking, that they overlook and ignore established groups with good links to other groups. The result is that traditionally excluded groups are often not well represented in partnerships for regeneration – Asian women and young people, in particular, are absent from many partnerships, leaving their voices unheard. Involvement of particular groups appears to be driven strongly by local concerns and interests. Some partnerships, for example, have very little representation from BME communities in predominantly white areas. Little consideration is given to other groups at a national level, and very little guidance has been published.
- 6.20 Rather than planning for the whole community, therefore, regeneration partnerships can simply replicate the existing (and often criticised) practices of statutory planning authorities, and are equally as capable of failing to plan for the whole community. There is evidence to suggest that individuals involved in regeneration partnerships simply fight for their own 'pet' projects and interests. In NDCs, Board members have proved to be strongly territorial, and will fight hard for funds and

projects to be approved for their area or group. Members find it difficult to operate as a Board and produce some good long-term strategic thinking for the area as a whole, and not just specific pockets that they believe they represent. Several NDCs have reported problems of territorialism and community conflict, which have contributed to serious local tensions in a small number of instances.

- 6.21 Furthermore, while community-led regeneration partnerships may be more adept at planning for local residents, the tensions between communities and statutory service providers has meant that residents are less willing and less skilled to plan for non-residential interests, such as local businesses and the private sector. While LPAs have to plan more strategically, community-based regeneration projects may be more skewed towards particular interests.

Planning authorities and partnerships for regeneration

- 6.22 The relationship between planning authorities and regeneration partnerships is ill-defined and unclear, which has, in some cases, created tensions between the two as to who exactly is 'in charge' of planning in area-based initiatives. There is some evidence of co-operation between the two. Master planning exercises are currently being undertaken by NDCs, which require the involvement of planning departments. There is some evidence to show that, where there are good existing relationships with local authorities, planning departments can become involved. However, many NDC partnerships are relying on consultants to assist with their Master planning exercise.
- 6.23 In a small minority of NDCs, there are strong links at all levels between the NDC and the local authority, and this enables planning decisions around housing and other specific developments to be negotiated and approved fairly quickly. In other cases, however, the relationship between NDC and the local authority can be tense, particularly if the two have diverging visions for the NDC area. In several cases, NDC partnerships have clashed with local authorities over their plans to manage housing in the NDC area. There is a significant issue here as to which body's views and wishes take precedent: the NDC, which is likely to have significant community input into their plans, but which has no formal planning experience or knowledge of planning procedures/policy; or the local authority, which not only takes a more strategic view of planning, but also has statutory planning powers and ultimate power of approval over any physical development? It is an important issue for many regeneration partnerships, and the relationship between partnerships and LAs requires some urgent clarification.

Conclusions

The research reveals several key issues in diversity, planning, regeneration and neighbourhood renewal:

- Regeneration partnerships are responsible for planning and delivering significant physical and social changes within a particular area, but often have little planning expertise
- The relationship between regeneration partnerships and local planning authorities is ill defined and unclear
- Although there is great potential for regeneration partnerships to plan for issues around diversity, there is no real onus for them to do so
- Regeneration partnerships have not been issued with any special guidance or training regarding planning for diversity
- Some partnerships have made significant efforts to engage a broad range of people in their decision-making processes
- Some partnerships have developed sensitive projects that fulfil unmet needs, but this is a matter of choice rather than obligation

Chapter 7

Planning Policy Guidance: Addressing Diversity

Key Findings

- The series contains no explicit reference to planning for diversity
- The series does contain a range of direct and specific references to identified groups in society, although this varies considerably across the series
- The most common references within the 'key groups' are to disabled people and access is the key issue that permeates the series
- References are generally isolated in their occurrence and do not demonstrate a systematic approach to diversity issues or of the particular needs of the key groups
- Procedural PPGs do not consider diversity issues and are insensitive to the needs of specific groups
- In relation to participation and involvement, key groups are addressed differently with no evident rationale for this
- Only occasional references are made to monitoring the impact of planning policies and decisions on different groups in society
- Some LPAs do not identify diversity as a relevant land-use planning issue
- Local authorities recognising diversity as an important policy consideration note a lack of effective policy advice and good practice guidance on the land-use implications or spatial planning aspects of diversity
- PPGs are regarded as the principal means of legitimating diversity as a relevant planning consideration
- Representative groups value the opportunity to influence the content of the PPG series, although it is only disability organisations that appear to be positive on the extent to which Government is addressing their concerns
- Good practice guidance could provide local authorities with some practical measures for translating diversity issues into realisable planning policies and proposals

Introduction

- 7.1. This chapter sets out an approach to developing national planning policy guidance, which is sensitive to the needs of a diverse society. It does not offer a blueprint for preparing or writing guidance and policy notes, but does offer pointers to good practice. In time, these may well need to be refined. An important aspect of the approach that is being advocated is an emphasis on the involvement of diverse users and interests into the process of drawing up guidance. Monitoring the efficacy of guidance through continued contact with user groups, identified as appropriate in relation to the guidance under consideration, is a natural extension of that approach.
- 7.2. The PPG series has been written over very many years, with some published over a decade ago. Revision of the series provides an excellent opportunity to incorporate a concern for valuing diversity, a strand of public policy which has become more pronounced only after many PPGs were published. The uneven treatment of diversity in the current PPG series is not surprising; but it is noteworthy that more recent PPGs contain illustrations of how the importance of diversity can be acknowledged. They also contain examples of what we might now regard as 'missed opportunities' – places where there are important messages which could be conveyed to LPAs about the need to be sensitive to different needs, or to be aware of the possibility of differential impacts of policy.
- 7.3. This chapter draws selectively upon a diversity proofing of PPGs 1 - 25 undertaken as a kind of 'taking stock' to assess the degree to which they are sensitive to diversity. (Detailed commentary of the diversity proofing of each PPG in the series is provided in Appendix 2). It is hoped that references to existing PPGs will help clarify the approach being advocated for the future publication of Planning Policy Statements (PPSs).
- 7.4. PPGs intend to influence behaviour of key actors within the planning system. The PPG series can be effective in identifying and promoting key policy issues – for example, the revision of PPG1, General Policy and Principles, in 1997, emphasised the importance of design. Sensitising PPGs to the challenges of a diverse society should also help change the behaviour of key actors. It is appropriate, therefore, that this chapter draws on the views of policy users on the effectiveness of the PPG series, particularly findings from the questionnaire survey and key actor interviews. The next section emphasises that local authorities, in particular, are receptive to influence on this issue – indeed, are anxious to receive a lead from ODPM.

The desire for improved policy and advice

7.5. The questionnaire revealed that just over 47% of respondents find relevant information on diversity and planning in national government policies. It could be argued that this illustrates the authority that PPGs enjoy, so that they are consulted even on topics which have manifestly received patchy attention within them. It also illustrates the great need of LPAs for advice on these issues.

Table 7: Where do LPAs find information on diversity and planning?

	Yes No. (%)	No No. (%)	Haven't looked No. (%)
National government	99 (47.4)	19 (9.1)	91 (43.5)
Local government	71 (36.2)	28 (14.3)	97 (49.5)
RTPI	108 (50.7)	14 (6.6)	91 (42.7)
Equalities bodies	91 (43.1)	21 (10.0)	99 (46.9)
Other	23 (29.9)	4 (5.2)	50 (64.9)

Source: Authors' survey, 2003

7.6. Perhaps understandably, a practically equivalent proportion of LPAs do not currently look to national government for advice on diversity, and therefore in future clearer sign posting of available guidance is necessary.

7.7. The research shows that a sizeable minority of local authorities are not aware of, or continue to resist, guidance on diversity issues. Consequently, there are significant differences in the extent to which local authorities perceive diversity to be a relevant issue in their locality, or at all related to the role and function of the land-use planning system. As Chapter 3 shows, there is limited understanding of the term diversity and also of how diversity issues relate to the planning system. A more clear and consistent consideration of the implications for planning of valuing diversity would go a long way to reducing the size of this minority.

Table 8: LPAs that act on guidance about diversity and planning in relation to key aspects of the planning process

	No. (%)
Formulation of development plan policies	173 (81.6)
Preparation of SPG	100 (58.8)
Advice on planning applications	134 (72.4)

Source: Authors' survey, 2003

7.8. There is an important role that PPGs can play in this area therefore, but at present the series is not frequently considered to be helpful by those who use it for diversity-related purposes. Less than 20% of respondents to the questionnaire stated the PPG series to be helpful or very helpful in addressing diversity issues. The series is considered by some LPAs to be lacking in guidance on how to translate diversity issues into a land-use planning context and the design of tangible and effective planning policies.

Table 9: How helpful are PPGs in enabling local authorities to address issues of diversity

	Local authorities No. (%)
Very helpful	2 (0.9)
Helpful	43 (18.9)
Neither helpful or unhelpful	133 (58.6)
Unhelpful	45 (19.8)
Very unhelpful	4 (1.8)

Source: Authors' survey, 2003

7.9. Local authorities' responses to the adequacy and helpfulness of PPGs vary depending on the extent to which respondents expect that guidance to be explicit or implicit in addressing diversity. Some respondents identified that diversity issues are expressed well enough in present Government policy guidance. For example, in PPG 12, Development Plans (December, 1999) references are made to specific groups and social considerations, where such concerns should be addressed in the reasoned justification for policies. For some LPAs, the PPG series provides sufficient policy messages related to diversity in this implicit manner. For those seeking more explicit guidance on diversity issues in the PPGs, the series was regarded as disappointing, dated and in need of revision.

7.10. Comments were also made in interview on the continuing use of dated stereotypes in Government policies, with particular references to age and gender. For age, the perception was noted that Government policies promote the image of a retired, inactive person with less ambition and drive, whereas this obscures the very different kinds of lives older people can lead.

7.11. Yet the central message on the role of government guidance is that very many LPAs feel they need it, and it needs to be re-cast. This is required to promote the acceptance of diversity as a relevant planning issue and to provide practical guidance where it is already recognised as a legitimate planning consideration. The case was made by one LPA respondent:

'we need guidance on how diversity issues other than the well known ones...can be treated as a material land-use or spatial planning issues and the type of policies, proposals, development control criteria or conditions that are robust and practical and defensible in law'

- 7.12. This quotation indicates that where diversity is recognised as a relevant planning issue, LPAs would find good practice guidance to be useful as a complement to formal statements of central government planning policy on diversity. Furthermore, the availability of good practice guidance varies across a range of diversity issues. For example, advice on disability and access was noted to be available, (see Planning and Access for Disabled People, A Good Practice Guide, ODPM, 2003) while other issues, such as advice on planning issues related to the needs or aspirations of women or religious groups, was underdeveloped in PPGs.
- 7.13. It is clear that where PPGs provide advice on diversity issues, local authorities typically respond by including relevant policies in their development plans and using it in development control functions. This can be taken as confirming the potential of formal statements by central government on diversity and planning to effect change at the local level. One planning officer endorsed the PPG series as 'a good route to go through if you want to encourage planners to tackle diversity...they will take notice of them'
- 7.14. There is therefore a clear indication that 'if a strong message came through the PPGs, that diversity issues are OK, this will encourage planners to use them'. The PPGs are seen by those in practice as being an important means of legitimating particular issues as valid planning considerations, especially in cases such as diversity that are widely regarded as being marginal to planning as traditionally defined. The making of a clear statement in the PPGs on diversity and planning would appear to provide confidence to those LPAs wishing to address diversity issues to do so.
- 7.15. Respondents suggested areas where more explicit and directive advice on diversity would be especially welcome. In particular transport, housing, employment and design were highlighted. It was also suggested that policy and advice should address tensions between different policies, where the promotion of diversity may conflict with other planning concerns, such as the protection of the historic built environment.

Reviewing PPGs and addressing diversity

7.16. In this section an approach to sensitising PPGs to diversity is suggested. It broadly addresses the following key issues:

- The need for clarity and consistency of purpose, within each PPG and across the series
- Addressing the needs of all groups and eschewing stereotypes – which involves thinking through implications of policy for a wide range of social groups, not simply one or two groups that are assumed to be the main stakeholders
- Providing examples of how planning policy and practice can be improved by acknowledging social diversity
- The need for vigilance in relation to indirect discrimination and unfairness in planning procedures and processes

7.17. Given the desire of local authority planners for a clear lead on diversity, the fact that currently the PPG series contains no direct reference to planning for diversity can be seen as a missed opportunity. For example, at present there is no 'headline' statement in PPG1, General Policy and Principles (February 1997) that diversity is as strong a component of the Government's approach to planning policy as design, or access. The contribution of planning policies and the planning system to diversity is often implicit in the phrasing of various statements throughout the PPG series.

7.18. The potential for getting a message across to LPAs is demonstrated by the way issues of access for disabled people are handled in recent PPGs. The wording of PPGs (eg PPG1, General Policy and Principles, February 1997 and PPG 13, Transport, March 2001) and the reasonably consistent attention paid to access leaves readers in little doubt that this is now an important policy consideration within the planning system.

7.19. In reviewing the PPGs, **PPG1 needs a headline statement** that good planning acknowledges and responds to the diverse needs of a complex society. To do so it must take equality of opportunity and diversity seriously. This must run through the planning system as one of its guiding principles. Such a statement would make it clear that valuing diversity was central to government planning policy, and should also be central to LPAs.

7.20. Some aspects of the series as a whole can cause uncertainty. The PPGs have a range of specific references to identified groups in society, such as women, older people, children and BMEs. But this

varies across the series, with no explanation for the variation. Equally, some documents in the series contain no direct references to 'key groups'. For example, PPGs 4, Industrial and Commercial Development and Small Firms (November 1992) and 7, The Countryside-Environmental Quality and Economic and Social Development, (February 1997), have no direct reference to any of the groups featured in the template used for proofing (see Appendix 2). This inconsistency can cause confusion where there the readers of PPGs are already uncertain about the implications of respecting diversity.

- 7.21. The recommendation of this report is that **PPGs 1, General Principles and Policy and 12, Development Plans, should contain a clear statement that contemporary society is composed of people with very different ways of life, aspirations and needs.** Good planning must strive to be sensitive to the needs of all the community, and at the very minimum must help secure key opportunities for all groups, such as access to employment and housing.
- 7.22. LPAs must be clear about the, possibly very varied effects of proposals, policies and individual developments, on different social groups. This approach to planning is part of what it is to plan properly; it is not an optional extra. Research and everyday experience tells us that certain groups have, historically, been in danger of having needs and aspirations overlooked and it is particularly important that they are considered explicitly in assessing development proposals and policy proposals. But there are others who may also be at particular risk of having their concerns marginalised (eg some of the groups in Chapter 3) and these, too need to be considered. In general, the key message is that good planning eschews reliance on stereotypes and planning authorities need evidence of the potential or actual impacts of policies and proposals on their diverse population. **PPGs 1, General Principles and Policy and 12, Development Plans, should advise LPAs on assessing the impact of policies and proposals on different social groups.**
- 7.23. This message will be reinforced if each PPG repeats the concern for diversity, and illustrates how it relates to its concerns. In Appendix 2 there are a number of examples of how LPAs might be encouraged to think through the implications of policy for a diverse population. It is essential, in order to make an impact on the readers of PPGs, that this is done in all PPGs (see Appendix 2). For example, self employment is disproportionately important to some BME groups as a source of employment, and hence planning policies in relation to small firms may impact disproportionately on some BME groups; LPAs need at the very least to be aware of this potential outcome in their areas, by undertaking appropriate research. In addition, as these may well be groups suffering social exclusion, planning authorities need to be aware of the impacts of proposed planning policies for the achievement of other corporate objectives in relation to social exclusion. **A**

discussion of the policy implications for diverse groups should be incorporated in the relevant PPG (eg, PPG 4 in the example cited above) as an application of the general principles set out in PPG1.

- 7.24. **At the earliest drafting stage, national guidance should be 'proofed'** in something like the manner set out in Appendix 2 so that there can be an indication from the outset that fundamental needs and concerns of all groups are being addressed; that the guidance is not operating with a limited and limiting set of stereotypes about how people live and wish to live.
- 7.25. Most PPGs are focused heavily on policy, but a few contain advice on processes and procedures (eg PPG 12, Development Plans, and PPG 18, Enforcing Planning Control). It is very important that these PPGs relate the lessons of the Macpherson Report to a planning context. A key lesson of Macpherson was that discrimination within bureaucratic processes can be inadvertent, yet systemic. Monitoring of the operation and output of procedures and processes is a vital tool in sensitising organisations to institutional discrimination. **Relevant PPGs should insist that enforcement, consultation on development plans, and other processes are monitored, and the results made public and acted upon.** There is a great deal of advice available as to how monitoring can be approached.

Input into the review of the PPG series

- 7.26 A new approach to writing national planning guidance will be easier if ODPM can draw upon expertise outside government. There is every reason to suppose that assistance would be forthcoming. A range of representative organisations in planning, equalities and diversity valued the opportunity to influence change in national planning policies, most notably through the PPGs. In this research project, only those groups representing disability issues responded positively to being questioned on the how well central government was addressing their organisation's concerns, a position which would surely be rectified if the process of drawing up guidance cast its net wider.

Conclusions

- Equality of opportunity and diversity must run through the planning system as one of its guiding principles
- PPG1 needs a headline statement that good planning acknowledges and responds to the diverse needs of a complex society, which is composed of people with very different ways of life, aspirations and needs.
- A discussion of the policy implications for diverse groups should be incorporated in each relevant PPG as an application of the general principles set out in PPG1.
- PPGs 1 and 12 should advise LPAs on assessing the potential impacts of policies and proposals on different social groups
- Relevant PPGs should insist that enforcement, consultation on development plans, and other processes are monitored
- This chapter sets out a fresh approach to drawing up PPGs, an approach which develops some of existing practice. It involves three important processes at an early stage :
 - a) consultation with key stakeholders prior to first draft, to discuss their concerns and aspirations
 - b) drafting, followed by proofing
 - c) re-draft discussed with key stakeholders
- It is important that the effects of national guidance for diverse groups are monitored, and the results both publicised and fed in to future policy making

Chapter 8

Recommendations

- 8.1 The findings from the research on planning and diversity should be used to support culture change in the ODPM and planning profession more generally. Drawing on the findings of the research, this chapter makes a series of recommendations for the ODPM, which are required to mainstream diversity in the review of national planning policy guidance and make links with regeneration and renewal.
- 8.2 The findings of the research on planning and diversity, together with the recommendations, will be used internally within the ODPM to inform and guide the review of PPGs. The findings will also be used externally to prepare a series of shorter, highly focussed reports for LPAs, professional bodies, equalities bodies and key public and voluntary sector organisations involved in planning, development and regeneration, to disseminate the findings, raise awareness and develop knowledge on planning and diversity.
- 8.3 The recommendations for implementation by the ODPM are set out below:-

Priority: High

1. The PPG review process should:
 - set up an external reference group on planning and diversity to advise on, and inform, the revisions to each PPG and the related consultation process. The group must be representative of a wide range of interests to provide expert and informed input on diversity issues
 - undertake diversity proofing of draft PPGs and amendments to PPGs, which result from consultation
 - engage with a wide and varied range of user-groups and stakeholders with interests related to diversity during consultation on draft PPGs. Short highly focussed reports on planning and diversity should be used to support the consultation process and enable key stakeholders to effectively engage with the process.
2. The review of PPGs should ensure that:-
 - a headline statement on planning and diversity is included in PPG 1, General Principles and Policy, which identifies diversity as a legitimate planning consideration; defines diversity; and provide worked examples. It should also provide advice for dealing with major applications on how to assess the implications for diverse social groups

- a discussion of the policy implications for diverse groups should be incorporated in each relevant PPG as an application of the general principles set out in PPG1. Clear direction on planning and diversity issues, should be provided, including policy conflicts, where they involve diversity issues. A consistent and systematic approach to the coverage of diversity issues across the PPG series should be adopted and policy objectives must also be made explicit
 - PPG12, Development Plans, should require LPAs to provide clear development plan policies in relation to diversity, which will assist development control officers in dealing with individual applications. It should also require LPAs to make an assessment of the impacts on different groups or communities in the development plan. Advice on undertaking diversity impact assessment should be issued with PPGs 12 & 1
3. Develop good practice guidance on planning and diversity to provide LPAs with some practical measures for translating diversity issues into realisable planning policies and proposals, and support the effective delivery and implementation of policy/policies on planning and diversity set out in PPGs.

Priority: Medium

4. Provide advice for all those involved in plan-making, development control and enforcement to understand what is meant by institutional discrimination, and the significance of techniques such as monitoring and consultation in tackling institutional discrimination and addressing diversity more generally.
5. Encourage LA's to provide training on planning and diversity to secure legislative compliance from LPAs, to develop knowledge and understanding of institutional discrimination and ensure delivery of equality and diversity in the planning system.
6. Encourage LA's and Regeneration Partnerships to provide training in planning, regeneration and diversity to develop understanding and expertise and develop better links between planning and regeneration.
7. Best Value inspections should assess the performance of LPAs in addressing diversity in plan-making, local planning policy, development control and enforcement, monitoring and training and relevant indicators developed.

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