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The Royal Fine Art Commission and 75 years of English design review: the first 60 years, 1924–1984

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ABSTRACT
This paper is the first of two linked papers that focus on the work of the Royal Fine Art Commission (RFAC), which, for three quarters of a century, held the mantel of the UK Government’s advisor on design in the built environment for England and Wales. The paper draws on archival and documentary evidence to explore the important work and concerns of the RFAC from its creation in 1924 and its early years, through to the post-war construction boom and into the 1980s and a new less paternalistic era of government. Analysis of the archives is supplemented by what the limited available literature tells us about the RFAC. As the instigator of a national design review service covering England and Wales, the work of the RFAC forms an important context for understanding more recent approaches to design review, both in the UK and internationally, that today form a critical component of contemporary planning practices.

KEYWORDS
Royal Fine Art Commission; design review; design governance

In the beginning

Prior to the Royal Fine Art Commission (RFAC), local government in the UK had dabbled in a rather patchy and inconsistent manner with controlling various aspects of design, most notably through the auspices of the Town Planning Schemes enabled by the 1909 Housing and Town Planning Act, and later through a series of city acts such as the 1921 City of Liverpool Corporation Act.\textsuperscript{1} The instigation of the RFAC, however, brought with it a new mode of design governance that Delafons later christened ‘The Authoritative Intervention’;\textsuperscript{2} or seeking external, dispassionate advice from outside experts. This was not an entirely new idea as a Committee for the Inspection of Models for National Monuments had been set up by the Treasury in 1802 to supervise the erection of suitable monuments to the heroes of the Napoleonic wars. The ‘Committee of Taste’ (as it quickly became known) was manned by seven leading ‘connoisseurs and collectors of British paintings and classical antiquities’ under the chairmanship of the Conservative politician (later Minister) Charles Long (first Baron Farnborough).\textsuperscript{3} It ran competitions, exhibited and selected designs, awarded commissions, and supervised the erection of monuments; and later even branched out to supervise the repair of key public buildings. It operated until the mid-1820s when Long stepped down as Paymaster of the Forces and left the Government.
In 1841, a second committee, this time under the title the ‘Fine Arts Commission’ was set up under the aegis of the young Prince Albert to supervise issues of public taste and the commissioning of didactic frescoes relating to the recently completed Palace of Westminster. The Prime Minister of the time, Robert Peel, described the group as being ‘composed of Members of each House of Parliament selected without reference to party distinctions, whose attention has been directed to the Cultivation of the Fine Arts’.

In fact, the remit of the group never really extended beyond decoration of the new House with appropriate art and was disbanded in 1863 when it ran out of steam following the death of Prince Albert two years earlier.

Sixty years on, the RFAC of 1924 was a far more ambitious undertaking than either of the two earlier schemes, although in the manner by which it came into being, it had strong parallels with the Committee of Taste a century earlier. In the aftermath of the First World War, Sir Lionel Earle, Permanent Secretary to the Office of Works (1912–1933), had been charged with responsibility to approve and site numerous war memorials across London. To help him in the task, he set up an unofficial advisory committee. The committee worked well at first but soon ran into difficulties relating to the depiction of nudity in sculptures commissioned for The Strand and Hyde Park. The hubbub quickly confirmed, in Earle’s mind, the need for a more independent and authoritative source of advice, and for a more recent model, he turned to Washington DC where, in 1910, Congress had established a group with an almost identical title to Prince Albert’s Commission. This ‘Commission of Fine Arts’ was established ‘to advise upon the location of statues, fountains, and monuments in the public squares, streets and parks of the District of Columbia’ and generally on questions of art when required by the President or by a committee of Congress.

The powers (and reputation) of this American commission quickly grew to advise on plans for almost any public building erected in Washington and, in 1923, it was with this model in mind that Earle suggested to his Minister, the Conservative peer and politician, the 27th Earl of Crawford and Balcarres (later the first Chairman of the RFAC), that an architectural commission was required in order to advise government on the artistic merits of new developments. The idea was taken up and put to the Cabinet, in 1923, with the new body announced in January 1924. It was thus the Conservative government of Stanley Baldwin that set up the RFAC, although the Commission did not actually meet until February 1924, two weeks into the first ever Labour administration.

Initially, its membership encompassed eight (all male) establishment figures, including four architects, one planner, two non-professionals, and an artist, who met under the rather opaque title of the Royal Fine Arts Commission. The Commission itself seems to have been responsible for the title that, perversely, tended to obscure its nature and function from everyone who was not already ‘in the know’, but which inertia ensured remained in place until the Commission closed its doors in 1999. In 1971, the Commission even concluded that the title was leading to misunderstandings over the role of the Commission ‘We’, they said, ‘have considered recommending that the title should be changed, but no acceptable substitute which accurately defines our responsibilities has yet commended itself’ – perhaps suggesting that they did not try very hard. ‘Royal’ was included in the title so as to establish it as ‘an unpaid public body’, whilst use of the term ‘Arts’ (which features in early minutes) was quickly tweaked to the singular, ‘Art’, at the request of the Commission.

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4Quoted in Saumarez Smith, “Civilizing Servants.”
5Riding, “Westminster.”
6Youngson, Urban Development, 18–19.
7Ibid., 24–5.
8Ibid., 30.
for no obvious reason. It was nevertheless under this organization that the process of reviewing design was first developed and refined.\textsuperscript{11}

In contrast to the Washington commission whose remit (the District of Columbia) was not much larger than the city of Washington itself, the geographical territory of the British equivalent was to be country-wide, or at least England and Wales, with (after some debate) Scotland forming its own RFAC for Scotland in 1927. Also, by way of contrast, the new commission based in London had absolutely no powers beyond some obscure powers under ecclesiastical legislation, passed in 1924, that set down a statutory requirement to consult the RFAC on measures to protect churches of archaeological, historic, or artistic interest.\textsuperscript{12} It could neither insist that projects were referred to it, nor demand that its recommendations were followed, or even that its deliberations were given due consideration; although Lord Crawford expected that statutory powers might eventually be granted.\textsuperscript{13}

**The rules of engagement**

The Commission met for the first time on 8 February 1924, after receiving a government grant of £2000 (for its first two years) and amid what appeared to be confusion among the commissioners about the nature of their role. The Commission had to interpret both what the press felt was its duty and what Government had in mind. According to the press (as quoted in RFAC minutes), ‘the duty of the Commission is not only to prevent blunders but to “beautify England”’,\textsuperscript{14} suggesting a dual mandate to be both active and reactive. But according to its establishing communiqué, the Commission’s ability to do this was extremely limited, as it was ‘purely advisory’, and only able to ‘intervene when invited by some responsible body’.\textsuperscript{15}

This issue of their scope for initiative was contentious from the outset and the commissioners debated the issue at their inaugural meeting in terms of whether they should be passive, waiting for requests to arrive, or should actively seek out opportunities to guide projects in order to beautify England. In order to establish the boundaries of the Commission’s involvement with schemes, commissioners elected to establish two guiding principles. First, the RFAC ought to be involved ‘prima facie’ in projects, in other words from the earliest stages of a design in order, as they saw it, ‘to avoid blunder’. Second, their role should be limited to critique; in other words, they would not take part in any drawing, instead favouring critical examination and suggestion.\textsuperscript{16} Precedence, as with any government institution, became an important determinant of future behaviour, and these principles remained intact throughout the life of the RFAC.

Another early preoccupation related to the professional conduct of commissioners. On this issue, there was an identified tension between the dual role of commissioners as simultaneously professionals in their ‘day jobs’ and public servants working for gratis for the Commission. Taking the stance that the commissioners should not gain (directly) from their position, it was determined that the Commission would not get involved in recommending specific professionals to those in need of advice beyond that which the Commission itself could give. Neither should third parties

\textsuperscript{11}The Commission referred to processes of ‘enquiry’ into schemes, and the term ‘design review’ was not widely used in the UK until the 2000s. RFAC enquiries nevertheless involved reviewing design proposals and passing judgement on their merits and therefore the term design review is used in this article as the more widely understood generic term for such activities today.

\textsuperscript{12}Delafons, *Politics and Preservation*, 121.

\textsuperscript{13}Youngson, *Urban Development*, 38.

\textsuperscript{14}RFAC, “Minutes,” February 8, 1924, 2.

\textsuperscript{15}Ibid., 2.

\textsuperscript{16}Ibid., 3.
assume that the advice of commissioners was available outside of the commission without payment of an appropriate fee. Whilst this need to avoid conflicts of interest by clearly separating professional commitments from the work of the Commission survived through to the end of the RFAC, the issue came back to haunt its successor, the Commission for Architecture and the Built Environment (CABE), indicating how precepts based on gentlemanly conduct and precedent that might have been fit for the 1920s increasingly became outmoded as the larger governance context within which the RFAC operated modernized. Despite this, little evidence can be found that the RFAC was ever significantly compromised, and commentators are often at pains to point out how commissioners themselves (despite their eminence as practitioners) frequently fell foul of Commission judgements.

Amenity and artistic merit

In the rush to establish the Commission, it had been set up without agreed terms of reference, and it was not until April 1924 that an amended directive set out the duties of the Commission:

To enquire into such questions of:

Public amenity or of artistic importance, as may be referred to them by H.M. Government, and to report thereon.

Furthermore, to give advice on similar questions when so requested by public or quasi-public bodies where it appears to the Royal Commission that their assistance would be advantageous.

This (which also formed the basis for its Royal Warrant granted in May 1924) inevitably raised issues about how to interpret the key concepts of ‘artistic importance’ and ‘public amenity’ that defined the limits of its remit. Whilst there was never a public record of the interpretation of these concepts, early minutes reveal that the commissioners did discuss such matters and quickly agreed not to agree on a defined ‘official’ interpretation. For example, it was decided that designs should be critiqued on a case-by-case basis and not against any pre-agreed precepts of ‘good design’, and in particular that no architectural styles would receive special treatment. Again, this early precedent informed the work of the Commission for many decades, although the RFAC did, in its later years, become more willing to set out the principles that it expected others to follow. There was also discussion about the extent to which the Commission should concern itself with the economic and engineering viability of schemes. On this, the commissioners resolved that as these were not matters of artistic expression, they would not form part of the Commission’s recommendations.

The terms of reference had been the subject of correspondence between Sir Lionel Earle and Lord Crawford, with Lord Crawford arguing that the scope defined by use of the dual terms ‘artistic’ and ‘amenity’ was critical in order to give the Commission a suitably wide and flexible remit that could be interpreted according to the circumstances. Earle argued that the term amenity was ‘a bit wide and dangerous’ with the potential to cover matters such as ‘the placing of lavatories and such questions, which could hardly, as a rule, come under the purview of this important body’. Lord Crawford won out and in time was vindicated as whilst the predominance of Commission deliberations focused on the visual aspects of buildings, a significant effort was also spent on helping to create or preserve

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19RFAC, “Minutes,” April 4, 1924.
important examples of the amenity of place. For Youngson, ‘Beauty and amenity are among the highest values that we have; they provide the setting for a civilized life’ and one cannot realistically be considered without the other. The minutes of RFAC meetings show that public space projects and site planning became concerns immediately as did public art, alongside broad questions of urbanism and context. This development of the remit away from purely ‘artistic’ concerns was therefore apparent right from the beginning and only increased from then on. As for other tasks undertaken by the Commission, whilst ad hoc requests for advice on granting Royal Charters to Art Societies or the internal decorations of public buildings cropped up in the first few years, the preponderance of work focused on the external appearance of buildings and spaces, and public works such as bridges and even street furniture. A final major task concerned the publication of annual reports of the Commission’s work. In fact, through pressure of work and lack of resources, these became increasingly erratic, and sometimes, there were many years between reports.

**Working without power**

The informal status of the RFAC as an organization without power of intervention left it relatively impotent to deliver on some of the early aspirations. The only patrons of the Commission at this time were public entities, and when affected by its deliberations private interests could easily ignore its recommendations. In fact, Commission minutes show that no private builders came to the Commission in its first year and rarely did any seek the Commission’s advice in its first decade. This was as intended given the reference to public and quasi-public bodies in the directive setting up the RFAC, although at the same time it greatly limited its potential impact. Even public projects could be out of the Commission’s reach if project champions did not request advice.

Although the Commission judged each building on an individual, context-specific basis, policy was important in establishing the framework within which development occurred. Early on, therefore, and in a recurring effort throughout its existence, the RFAC attempted to strengthen its position by influencing government policy and legislation with an impact on its remit. One example was what it called ‘the problem of high buildings.’ On this front, as on many, the Commission’s stance was a conservationist one, arguing that tall buildings could adversely affect contexts of national and historic interest. Its Fifth Report, for example, targeted the London Building Acts, about which, it argued, the singular concern with safety aspects of building high (notably fire) undermined a concern for public amenity. At this time, new buildings began to block views of St Paul’s Cathedral from certain vantage points, particularly from Waterloo and Southwark bridges, and the Commission identified ‘A growing tendency of building owners to build to the maximum height authorized by the act’ and ‘to seek exception from bye-laws of a restrictive character.’ The Commission recommended that local councils should be given the discretion to determine exceptions on the basis of a range of contextual considerations and concluded that: ‘The fact that a building faces a public park, an open space, or a river is often held to justify exceptional altitude, notwithstanding the fact that the area behind the building is thereby injured’. In short, the Commission wanted the legislation revised in order to help preserve the integrity of larger environments, and most importantly ‘unified compositions of architectural beauty’.

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22Ibid., 45.
25Ibid., 4.
26Ibid., 4.
Thus, although the Commission worked on a case-by-case basis, certain ideas – of coherence, of preservation, and of public amenity – quickly came to underpin the process of enquiry. It was particularly and consistently critical of projects that seemed to run against the grain of existing development patterns in a manner that could lead to the long-term disfigurement of places, particularly given that ‘many years may elapse before adjacent buildings are erected’.27 But it was not opposed to verticality per se. Instead, it argued for measures to ensure that if and when tall buildings surpassed their neighbours, that those buildings would be ‘finished and decorous in construction’ unless adjacent buildings were being constructed within a ‘reasonable short period’.28

Early impact

In its early work, the Commission might have been accused of being a little timid. Certainly, many of its recommendations related to minor changes to public realm proposals such as its recommendation that the Royal Artillery Memorial be turned to face Grosvenor Place – a proposition that was accepted without opposition.29 On another occasion, the RFAC advised on how University College London’s Gower Street buildings could best articulate with the surrounding area: UCL’s architects preferred a colonnade while the RFAC suggested a walled façade, leaving the Portico as the only columned section. This idea was embraced and is manifest at UCL today (Figure 1).

Another project was a commission by the Postmaster General for the RFAC to oversee a design process for the country’s phone boxes.30 The existing design (K1) was considered unsatisfactory and so the Commission organized a competition, collected the designs, and ruled on the winning proposal by Sir Giles Gilbert Scott. This became K2 (Figure 2), the iconic British red phone box, which set the standard for British phone boxes – K2 to K6 – for many years to come.

Also interesting is what was not asked of the RFAC during its nascent years. The Commission was perturbed, for example, when designs for the rebuilding of Waterloo Bridge in London did not pass their doors. Its commissioners even prepared a memorandum requesting that it be consulted and voicing certain concerns, although the letter was never sent when the Commissioners decided that this would have been more proactive than their agreed terms of reference allowed.31 Perversely, they did later make their opposition to the demolition of the nineteenth-century bridge known to London County Council, but only after the decision to demolish had already been taken.32 Whilst this caused some delay to the project, ultimately, demolition was ordered, with the RFAC awarded the consolation prize to promote a competition for the bridge’s rebuilding.

The issue of bridges was a re-occurring theme for the Commission in its first few years, and its reviews demonstrated a clear and early penchant for venturing outside of its self-imposed boundaries, from architecture to engineering. Its Third Report was dominated by the issue and demonstrated two early concerns that remained with the organization throughout its existence.33 The first was with the impact of traffic on towns. The Commission’s critique that reverberations from the proposed St Paul’s Bridge (never built) would fatally undermine the foundations of neighbouring St Paul’s Cathedral represented a case in point, as did a proposed new bridge at Marlow (further up the Thames) which, it believed, would impose an unwelcome scale on the town and undermine its

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27Ibid., 4.
28Ibid., 5.
29RFAC, “Minutes,” May 1, 1924.
30RFAC, “Minutes,” June 5, 1924.
31Ibid.
32Youngson, Urban Development, 34.
33RFAC, “Third Report.”
domestic street architecture, no matter what the convenience for traffic. A second was the importance of design honesty. Again, the Marlow Bridge can be used to illustrate the criticism following the Commission’s concern that concrete was proposed to be used in a manner that imitated masonry as opposed to one that reflected the innate qualities of the material. The critique echoed a larger concern that had first been raised two years earlier in the Second Report, namely that whilst the Commission strongly favoured the conservation of important townscape qualities (at a time when

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34RFAC, “Second Report.”
conservation was still a minority concern) and often argued vociferously for it, it did not favour pastiche and was at pains to point out that no architect should feel obligated to copy the design of buildings that they were extending. Instead, they should feel free to explore the latest thinking on design whilst respecting the context within which they were intervening.

Youngson argues that the Commission was generally successful in its early years and that this reflected two factors. First, its work was almost entirely focused on a radius of 30 miles from London; a London-centric view that arguably remained with the organization throughout its existence. Second, and helping to explain its focus, in these years, it was largely reporting to Sir Lionel Earle who set it up, and Earle mainly wanted advice relating to London. Indeed, when advising others, it was arguably less successful, for example, when called upon to review a design for South Africa’s new embassy on Trafalgar Square. In this example, the designer – Sir Herbert Baker – wanted the new structure to imitate the grandeur of the adjacent building, the National Portrait Gallery, while the RFAC determined that the building should mimic the Canadian Embassy, its opposing building. Sir Herbert’s design called for a portico, a high-pitched roof, and Corinthian columns. The Commission wanted the roof to be lower than the National Gallery’s and did not see the need for an extruded portico. The Commission also suggested very specific changes including Ionic columns and windows that aligned with neighbouring buildings. Thus, although specifically drafting designs was not practised by the RFAC, written advice could be quite prescriptive (Figure 3). After correspondence involving the architect and the High Commissioner of South Africa attempting to convince the Commission that their stance was incorrect, the RFAC responded with a letter effectively throwing in the towel: ‘In these circumstances my colleagues fear that effective agreement on the question of principle is improbable, and that it would accordingly be superfluous to trouble you with further observations or criticism’ (Figure 4).

A polite institution

Reflecting generally on the work of the RFAC, Delafons argues that ‘For many years the Commission pursued a policy of discretion to the point of virtually abstaining from public comment’. This was certainly very clear in the early years. For Punter, this tradition continued at least into the 1960s, with the Commission hardly making any impact on wider debates over the merits and purpose of ‘aesthetic control’, as the governance of design in the UK came to be known (in part no doubt because of the explicitly aesthetic remit of the RFAC). Instead, he argues, the work of the Commission was ‘unobtrusive and discreet and generally typical of English polite institutions’, working inside the system in a quiet and determined way, but not making too much fuss.

To some degree, this reflected the set-up of the organization. It was always envisaged that it would tread carefully in its early days, and in its Fourth Report, the Commission itself was candid about its lack of formal powers and the constraints under which it operated, restating that its duties were purely advisory and that advice could only be given when officially requested. They explained that ‘whilst we recognize that our views cannot always prove acceptable, we nonetheless think it desirable that opinions based directly upon aesthetic considerations should be formulated and

36RFAC, “Minutes,” July 18, 1929.
37Ibid., Appendix IV.
APPENDIX 1

Ref. Min.No.4686

Royal Fine Art Commission,
8, Burlington Gardens, Westminster,
July 19th 1930.

Sir,

1930 / South Africa House.

Sir Herbert Baker and Mr. Stirling were good enough to attend the meeting of the Royal Fine Art Commission on Tuesday, July 16th, and Sir Herbert Baker showed unlined drawings of the proposed offices for the Union Government of South Africa.

The Commissioners having examined the scheme bag leisure to make the following observations: They are of opinion that in order to complete the architectural composition of Trafalgar Square, the facade of the proposed South Africa building should conform as nearly as possible in general style and treatment to the Canada building on the opposite side of the Square. It is acknowledged that the dominating factor of the Square must be the relations of the East and West sides to its central Court, namely the National Gallery on the North side, accordingly, the verticality of treatment of the West side should be followed in the facade of the East side. The Order Imitating should conform in size as nearly as practicable to that of the Canada building and Colleges of Physicians. Amongst details the Ionic Order should be used instead of the Corinthian Order. The projecting portion in the centre of the facade should be omitted and the roof kept flat.

In the opinion of the Royal Fine Art Commission the new East facade should be designed as an integral part of the composition of the Square as a whole. In regard to the total height, the Royal Commission consider that the existing limitation of 42 ft should be maintained.

I am, Sir,
Your obedient Servant,
(Signed) H.R. Brandhave,
Secretary.

The Secretary,
Office of Commissioners of Crown Lands,
1, Whitehall, S.W.1.

Figure 3. RFAC letter of advice 1930.

Figure 4. South Africa House, Trafalgar Square, following rejection of the RFAC’s advice. Source: Matthew Carmona.
submitted to those concerned’, in other words, despite setbacks it had proved itself and its role had an intrinsic value.\footnote{RFAC, “Fourth Report,” 3.}

Reflecting growing confidence in its role, in 1933 (just as Sir Lionel Earle was retiring), the royal warrant of the RFAC was extended by adding the significant power to:

Call the attention of the Government and public authorities to any project or development which may appear to the Commission to threaten amenities of national or public character.

This represented an important innovation as, whilst still working within the system, the revision charged the Commission to become more proactive, giving it the power to initiate enquiries rather than just waiting for matters to be referred to it. The RFAC certainly became increasingly established in the run up to the Second World War with a wider range of government departments and increasingly local authorities (county, borough, town, and urban) seeking its advice. The result was that during 1935 and 1936, more than 100 enquiries were in progress,\footnote{Report in Hansard, \url{http://hansard.millbanksystems.com/commons/1936/dec/08/royal-fine-art-commission}.} but it was in the post-war period and in the context of a more active, if not always very design sensitive, British state that the work of the Commission was to significantly escalate.

**Post-war changes in the Commission**

As the focus of the nation turned from fighting to rebuilding following the Second World War, and as the state took on a new more active role in everything from planning to building, the scope of the Commission’s workload expanded greatly, in both its breadth and depth. This reflected a changed post-war political economy in which the state had become generally more interventionalist and was much more comfortable in engaging in design concerns. In the 1960s and 1970s, for example, various Ministries released a comprehensive series of Design Bulletins covering everything from house construction technologies, to space in the home, housing for special needs, and the design and layout of the external residential environment.\footnote{Carmona, *Housing Design*, 305.}

For its part, the Commission was now reviewing numerous proposals for public realm schemes, most notably street lighting and street furniture. During this period, towns across England were proposing new street lighting and propositions from Warwick, Stanford, Ilford, Abington, and many other towns passed through the RFAC, with the Commission advising, amongst other factors, on the spacing of lighting and the height of light posts, often favouring lights that were no taller than the eaves of the surrounding buildings. However, the frequency of these requests was difficult for the RFAC to handle and from the 1950s onwards, they were increasingly redirected to the Council of Design that had been created in 1944 (now the Design Council).\footnote{RFAC, “Minutes,” April 11, 951.} There were also more *art-qua-art* projects, including reviewing centenary stamp options for the postal service. The Commission was always happy to accept these more artistic enquiries within its scope,\footnote{RFAC, “Minutes,” January 18, 1940.} although despite inclusion of ‘fine art’ in its name, reviews of actual fine art were relatively rare; just four pieces between 1968 and 1971.\footnote{RFAC, “Twenty-first Report.”}

At the other end of the scale, planning cities became a primary concern of the Commission following the war when the review of detailed master plans for large areas of towns and cities became a dominant activity. This continued until the 1970s when the sorts of grand plans of the immediate...
post-war period became increasingly rare, and non-existent in the 1980s. The role was, to some degree, reflected in the membership of the Commission with Patrick Abercrombie, William Holford, and Charles Holden all appointed under the chairmanship of the 28th Earl of Crawford who, in 1943, stepped into his father’s footsteps.46 These changes marked a significant evolution in the remit of the RFAC, and whilst post-war planning was still predominantly a physical planning activity undertaken by architects, the Commission was no longer a purified aesthetics review board.

The Commission was also spurred on by the addition of ancillary powers, in 1946, that gave it access to documents, places, and people in the public sector of relevance to its enquiries. As the Twenty-second Report later proclaimed,47 the Commission may even ‘demand entry into a building or on to a site’ in pursuit of evidence to carry out its work, although there is no evidence that this ever actually occurred. The Commission nevertheless headed into the post-war period with significantly greater powers in order to play a higher profile role and,48 in direct contradiction with its earlier practices, soon began to establish a more proactive side to its operations. By the mid-1950s, for example, it was regularly broaching concerns with departments of government or local authorities if it believed there to be a threat to public amenity.

Under this concern for ‘public amenity’, it set itself against some of the key post-war design and building trends. In its Eleventh Report of 1952, for example, the Commission argued against the monumentality of many of the new buildings that were being proposed across the country, and in particular of office blocks. Their worry was that the monumentality of the buildings being proposed was usurping that usually reserved for key civic or religious buildings, and was being applied instead to buildings with none of the same significance on the emotional plane. Consequently, they argued, ‘to monumentalize them is to debase the currency of architectural values and to incur the risk of rendering the buildings themselves ridiculous’.49 Certainly, this was a period that saw no shortage of monumental thinking either in architecture or in planning.

**The Commission and post-war planning**

Some of the premier planning challenges were faced in London that had been so heavily bombed during the war. Thus, even whilst the war still raged, the City of London requested assistance from the Commission to review its emerging plan. The plan included maps for ‘traffic flow, land utilisation, war damage, pre-war redevelopment’ and ‘a new traffic scheme’ as well as a ‘draft plan for reconstruction’;50 all previously issues that would have been regarded *ultra vires*. The RFAC agreed to review the plan, although it quickly presented something of an existential crisis because of the complex inter-relationships between the physical city and the innumerable other processes of urban functionality that planning encompassed. In May 1943, the Commission initially focused its attention on height and zoning concerns because of its public amenity implications, but in August, it attempted to reduce its consideration to the aesthetic implications of the plan before,51 in September, accepting that was impossible and requesting information on traffic and congestion.52

In fact, the Commission (along with many others) was highly critical of the proposed City plan that had been prepared by the City engineer, and published its findings in a special report. This

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46The Herald, “Royal Fine”.
50RFAC, “Minutes,” May 19, 1943.
51RFAC, “Minutes,” August 11, 1943.
52RFAC, “Minutes,” September 15, 1943.
criticized the City for focusing too much on traffic at the expense of other concerns, including those relating to the size, shape, and alignment of key building blocks, and for failing to consider how the proposed ‘improvements’ to roads would impact on its successful redevelopment in architectural terms.\textsuperscript{53} Interestingly, whilst praising the response of the RFAC, the Ministry of Town and Country Planning observed that the Commission was clearly stepping outside of its identified field, although later approved of the appointment of both Charles Holden and William Holford (both commissioners) to prepare a new plan.\textsuperscript{54}

Beyond the City, by 1950, the Commission was active on the side of planning, often acting as a champion for planners against projects that seemed incongruous with their plans, most notably (and perhaps unsurprisingly given Patrick Abercrombie’s position on the Commission) those that seemed to undermine the \emph{County of London Plan}. The Tenth Report stated:

It seemed that not only were proposals for a Westminster precinct, put forward by Patrick Abercrombie and Mr JH Forshaw in 1943, being abandoned by the Planning Authorities, but the congestion which that proposal was designed to relieve was being actually increased by Government action. (Figure 5)\textsuperscript{55}

So, whilst the Commission set itself clearly in opposition to some of the key precepts of Modernist planning – high buildings and planning for the car – when these seemed to conflict with local contextual factors, this did not extend to all such precepts, and a penchant for clear bold physical planning was amongst the qualities that the Commission favoured.

This marked an ongoing preference held by the Commission; and so, as the century wore on and physical planning increasingly went out of style with post-war clean sweep redevelopments becoming discredited, the RFAC still and increasingly bemoaned the absence of genuine three-dimensional planning in city centre redevelopment.\textsuperscript{56} Indeed, from the late 1950s onwards, the Commission began to criticize the conduct of planning generally in England and Wales as being devoid from any clear vision or sense of proactive engagement (a critique that persists in England today). As early as 1958, it wrote: ‘it is not enough to invite private developers to submit their own schemes with little guidance from the Planning Authority, and then to accept the highest bid whatever architecture may happen to have been included.’\textsuperscript{57}

Later, it also directed a similar attack at municipal engineers and their highways schemes, arguing that engineers must compromise somewhere between the most economic road placement and the least aesthetically destructive one. So, whilst, to the Commission, the algorithm for successful road development in many highways planning departments appeared to comprise only engineering possibilities and economic viability, namely efficiency and congestion reduction, it needed also to reflect aesthetic factors. The Commission criticized roads that ignored the needs of the townscape in the process of delivering people to and from work, and argued in particular that ‘all too often traffic requirements are not properly related to other aspects of planning including the protection of old centres of character and the appearance of those redeveloped.’\textsuperscript{58} In short, the Commission increasingly abhorred the divorce, as it saw it, of design from the practices of modern planning and highways engineering and was one of the first public agencies in the UK to recognize the dangers that this separation would cause.

\textsuperscript{53}RFAC, \emph{Observations on}, 198–9.
\textsuperscript{54}Larkham and Adams, \emph{The Post-war}, 19–20.
\textsuperscript{55}RFAC, “Tenth Report,” 9.
\textsuperscript{56}Punter, “A History of … Part 2,” 32.
\textsuperscript{57}RFAC, “Sixteenth Report,” 8.
\textsuperscript{58}RFAC, “Eighteenth Report,” 8.
**Designing the post-war architecture**

Because of the sheer scale of the Commission’s involvement in post-war reconstruction, many details from this period are unclear or lost from the documentary record. In addition, the Commission’s reports to Parliament became more and more irregular and ended with a gap of 13 years between its Twenty-first and Twenty-second Reports (1971–1984). The majority of the RFAC’s work remained architectural design, and initially this focused on the reconstruction or war-damaged buildings.

On this front, the balance between conservation and the new became a recurring theme of RFAC deliberations and, in line with its pre-war advice, it tended to recommend restoration rather than complete redevelopment. In its Tenth Report, the Commission explained that where restoration of significant buildings was not possible, reconstruction should avoid mimicry and ought instead

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**Figure 5.** The Commission opposed proposals that undermined the Westminster precinct envisaged in the County of London Plan.
to follow a comparable style along with the same height and massing. These were points made time and time again by the Commission who in their Eighteenth Report argued that whilst completely destroyed buildings should be rebuilt with greater liberty, and building new buildings in the image of their predecessors was ‘mistaken’, one destroyed house within a city block did not warrant a completely new development beyond the scale and typology of the area.\textsuperscript{59} In its Twenty-second Report, the Commission explained that whilst it did not support building in the local vernacular merely to acquire planning permission and imitation was generally unacceptable, new buildings should adhere to the qualities of any dominant streetscape. Thus, if the fenestration of facades demand a stacked aesthetic (vertically oriented windows one on top of the other), new structures should also conform to this style, avoiding large horizontal windows that could ruin the street’s coherence.\textsuperscript{60} By contrast, landmark new buildings were given special attention and much greater latitude, with, for example, a recommendation (later accepted) that the National Theatre should be placed close to the River Thames in order to address the waterfront and maximize public amenity through new riverside public space.\textsuperscript{61}

At the significant risk of being criticized for being out of step with the times, the Commission continued to demonstrate a strong preference for contextual sensitivity. Famously, plans in the early 1960s to redevelop Euston Station led to a decision to demolish a hugely imposing Doric archway on Euston Road. Although the Commission strongly supported the new station design, an uncompromisingly modern aesthetic, it explained that the arch was critical to the character of the area and contributed greatly to the beauty of the original station. On this, it would not compromise and even suggested that,\textsuperscript{62} at proportionally insignificant cost, it ‘could have been moved to a nearby site and used to enhance the architectural effect of the new station’.\textsuperscript{63} Whilst the public were on the side of the RFAC and the episode eventually strengthened the burgeoning conservation movement, nationally, British Rail remained unmoved and persuaded the Prime Minister (Harold Macmillan) to sanction the demolition (Figure 6).

The episode reflected an ongoing battle in which the RFAC was fully engaged, fought between proponents of the most dramatic forms of scorched earth Modernist redevelopment and a desire amongst many to see a more sensitive response to urban development. The RFAC was not alone in this battle but felt a particular duty to oppose schemes that, in its view, would amount to the over-development of historic urban centres.\textsuperscript{64} As part of a much larger coalition, it won some of these fights, such as the series of proposals to redevelop Piccadilly Circus throughout the 1960s, whilst others were lost. It contributed towards the head of steam that led to the passing of the Civic Amenities Act in 1967 and the instigation of conservation areas across the UK. Looking back on this post-war period, and with the characteristic understatement of the time, the Commission observed: ‘fundamental improvements to the planning and design of buildings, following the Commission’s criticisms, were not uncommon’.\textsuperscript{65}

**Building high**

A major dimension of this concern remained the issue of building high which became a dominant theme of the Commission’s work from the early 1960s onwards. Again, the Commission was not

\textsuperscript{59}Ibid.
\textsuperscript{60}RFAC, “Twenty-second Report,” 8.
\textsuperscript{61}RFAC, “Minutes,” April 11, 1951.
\textsuperscript{62}RFAC, “Minutes,” April 11, 1962.
\textsuperscript{63}RFAC, “Eighteenth Report,” 9.
\textsuperscript{64}RFAC, “Minutes,” November 14, 1962.
\textsuperscript{65}RFAC, “Twenty-second Report,” 25.
opposed to tall buildings per se and nor was it opposed to all buildings that deviated from the historic contextual norms. It positively supported, for example, a range of London towers, including Milbank Tower, the Shell Building, and the Barbican, and whilst initially hesitant about plans for the most controversial tower of all – Richard Seifert’s 1966 Centre Point on Oxford Street – the Commission later described it as ‘having an elegance worthy of a Wren steeple’. By contrast, it vehemently opposed the Hilton Hotel on Park Lane (built), New Zealand House at Haymarket (built), Portland House on Portland Square (unbuilt), and a new barracks for the Household Calvary on Hyde Park (built). Members of the Commission wrote to The Times: This ‘is not about architectural design. It is about something that matters even more – the basic sizes and shapes of buildings in relation to the places where they are to be built’.

Thus, more than the aesthetics of proposals themselves, it was their impact on their setting and their undue prominence that was of concern, particularly when that was to have an undue impact on the setting of nationally important monuments, such St Paul’s Cathedral. Out of London, a good example of the Commission’s approach included opposition to a proposed 14-storey hotel on the Eastbourne seafront that threatened to dominate the front and block views from many other buildings. To address the problem, the RFAC recommended height zones with the intention of staggering building heights from two-storeys upwards towards the town centre, immediately behind. In this plan, each successive zone would allow for two-storeys higher than the zone closer to the sea, but could also only be two-storeys higher than the building immediately adjacent to it, thus preventing what they termed ‘aberrations’. For the Commission, the question of height was a matter of transition and coherence, as well as of the sorts of spaces that high buildings tended to give rise to at their

Figure 6. Euston today, the two gatehouses (foreground) are all that survive of the original station. Source: Matthew Carmona.

66 Londonist, “London’s Top.”
68 RFAC, “Eighteenth Report.”
base: ‘Such spaces … suffer the whistling drafts set up by the towers above and around them, becoming, if not unsuitable, at least highly unattractive as places to sit and walk about in’.\footnote{RFAC, “Twenty-first Report,” 13.}

As the Eastbourne example demonstrates, the Commission was prepared to engage with the problem of building high in a constructive manner, although proposals for high buildings were often grounds for negative RFAC recommendations. To help the situation and protect the historic fabric of cities, the Commission called on government and other bodies such as the London County Council to change regulations on building height. It argued that slab blocks of between 100 and 200 ft. were generally disruptive in their effect and undesirable, and in 1961 that ‘waivers for buildings above 100 ft. should only be given in cases where high buildings would make a significant contribution to the London scene and were really well designed’.\footnote{RFAC, “Minutes,” November 8, 1961.} On this point, the Commission was remarkably obstinate, even though buildings of 100 ft. (around 8 storeys) were not exceptionally tall in the 1960s. Nevertheless, the declaration that tall buildings that are well designed should be allowed shows that it attempted to remain open-minded at all times and continued to evaluate design proposals on a case-by-case basis. In so doing, it fitted in squarely with the British discretionary tradition in policy and with its avoidance of fixed legal entitlements.\footnote{Carmona et al., Delivering New, 106.}

\textit{Taking sides}

Whilst on the question of building high the Commission attempted to strike a careful balance and judge proposals on their merits, it was not always so balanced in its views. One structure that the Commission universally despised was the car park: ‘Car parks are essential so long as the present traffic behaviour exists. We make the proposition nonetheless that the parked car is just another form of urban rubbish, to be hidden as far as possible.’\footnote{RFAC, “Twenty-first Report.”} Thus, if a building required on-site parking, the Commission preferred it to be buried underground (even proposing a car park under Hyde Park) or that it be designed to look minimally like a garage.

Another area on which the Commission was unwavering was the need to avoid frivolity in design. Thus, when in 1969 Trafalgar Square returned to the in-tray of the Commission to consider a scheme to upgrade its lighting, the RFAC was firm in their rejection of ‘avant-garde’ colour-changing lights. Instead, it recommended in favour of a traditional and elegant scheme featuring white lighting for the square.\footnote{RFAC, “Minutes,” February 2, 1969.} This recommendation was accepted, although some might argue that it demonstrated an ingrained traditionalism within the RFAC.

For its part, the Commission acknowledged that it needed to strike a sometimes-difficult balance between encouraging good contemporary design and protecting the important historic qualities of place. It wrote:

\begin{quote}
It is not uncommon for amenity societies, preservation societies and other such groups to describe the decisions of the Commission as pusillanimous. This is perhaps not surprising for whilst developers or local authorities who wish to make sweeping changes may consider the Commission unduly obstructive, preservationist groups, from the opposing viewpoint, will almost inevitably regard the self-same attitude of the Commission as being too weak.\footnote{RFAC, “Twenty-first Report,” 9.}
\end{quote}

In general, the Commission trod this narrow path carefully and often seemed to carry the majority opinion with it, as was the case with the Euston Arch scheme and later a project to replace St Pancras.
Hotel (which was saved). At the same time, the Commission clearly favoured contemporary design for new developments with a ‘landmark’ potential or which were erected in areas that are not historically significant. It nevertheless remarked in its Twenty-second Report that whilst ‘an architecture appropriate to its surrounds … [is] never easy to achieve, it would be a little easier if more architects were prepared to forego their urge for self-expression and adopt instead a more modest approach’.

On one area, however, the Commission attempted to be strictly dispassionate, that of style. Thus, in the Commission’s Twenty-second Report, it pointed out why it always evaluated proposals on a case-by-case basis with an emphasis on height and general coherence as guiding principles: ‘Today there is no consensus about style and there are almost as many styles as there are architects’. In the same report, the Commission compared Quinlan Terry’s eighteenth-century-inspired Richmond Riverside (Figure 7a) with the uncompromisingly modern designs for the Lloyds Building in The City (Figure 7b), both of which it endorsed, refusing to ‘take sides’ on the matter of style, except where that stance compromised their larger concerns around context. By contrast, and on principle, the Commission did not approve of glass curtain buildings, arguing that ‘while there may be special situations where the scaleless and dissolving nature of such buildings is an advantage, in the majority of cases it is no help at all’.

Yet, the slight whiff that the Commission in fact favoured more modern styles never entirely vanished and was probably inevitable given its choice of commissioners, the architects amongst whom were invariably within the orthodox Modernist cannon. In an interview in 1982, the long-standing Secretary to the Commission, Sherban Cantacuzino (1979–1994) seemed to confirm this:

in a time of cultural anarchy with no generally accepted style the Commission must be democratic to a degree and reflect public attitudes, otherwise it will not command respect. On the other hand, Mr Cantacuzino is certain that ‘there are standards of design’ and that the Commission should encourage good modern design and reject what is pejoratively dismissed as pastiche – even if it is wanted by the public.

There was undoubtedly a paradox there, although for the RFAC it was simply a matter of supporting what they saw as excellence in style.

**Steady as she goes**

In the 40 or so years following the war to the end of their report covering the period 1971–1984, the work of the Commission continued to develop and grow, with the RFAC itself reporting that by the end of the era, it was not only advising government departments and local authorities, but also the nationalized industries (the privatization programmes of the Thatcher years had yet to get going), private companies, developers, and amenity societies throughout England and Wales. In today’s terms, much of the work that the Commission focused on might be described as ‘urban design’, although the term and the ideas surrounding that discipline had not yet caught up with the Commission, and, portraying an inherent inability to evolve, never really did.

Instead, as the twentieth century wore on, the RFAC might charitably have been said to have adopted a ‘steady as she goes’ approach under a series of ‘establishment’ Chairmen, such as the career civil servant Lord Bridges and later the eminent Professor of engineering, Sir Derman

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77Ibid., 25.
78Ibid., 26.
79Ibid., 26.
80Stamp, “Official Aesthetics.”
Christopherson, none of whom believed in rocking the boat. Indeed, with the possible exception of its early years under the stewardship of the 27th Earl of Crawford, guided by the redoubtable Sir Lionel Earle, and again in its later years (the subject of the second paper in this pair), the work of the Commission developed only gradually and was not shaped decisively by the agency of its various chairmen, commissioners, or by the secretariat. Instead, largely unseen by the public eye, the work of the Commission went on without fuss or significant publicity along the lines first established in its early years. In his memoirs, the architectural writer J.M. Richards, who served as a commissioner between 1958 and 1972, went so far as to argue that the Commission suffered from ‘an habitual reluctance to come out into the open, to announce its disquiet about any proposal at an early enough stage for public opinion to be effective’. He believed that to rally public opinion, as he had helped to do in the case of the Euston Arch, was potentially the Commission’s strongest weapon, ‘but too often it preferred to negotiate behind the scenes with, I believe, the idea that it should not antagonise the public authorities it had to work with’.

This, along with its now much heavier workload meant that more often than not the Commission tended to work under the radar rather than trying to make a public splash. It also reflected the general zeitgeist characterized by a less open and establishment-dominated approach to Government. Some, however, were not so kind, with The Telegraph describing the RFAC in this period as ‘a dozy quango [Quasi-autonomous non-governmental organization] which, for many years, could hardly even be bothered to produce an annual report.’ So, whilst in its Twelfth Report of 1954 the Commission complained that it was too often either not consulted at all or only consulted when it was already too late for its advice to be fully considered, by 1971, it was sanguine, arguing that ‘Sometimes its advice is ignored or overruled … by Government departments’, and that ‘failures of this sort by the Commission were

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**Figure 7.** (a) Richmond Riverside (1984) and the (b) Lloyds Building (1979): starkly contrasting architecture, both lauded by the RFAC because of their quality rather than their style. Source: Matthew Carmona.

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82 Richards, Memoirs of, 24.
83 The Telegraph, “Lord St John.”
more newsworthy than its successes. These, it suggested, were, by contrast ‘rarely noticed because the greatest part of its work is done unobtrusively, and more effectively, by reasoning and persuasion’.  

Parliament barely noticed the RFAC in this period (perhaps reflecting the lack of annual reports), but the concerns raised in its 1954 report did lead to a question in Parliament (to the Chancellor of the Exchequer) about whether the RFAC should be given statutory powers to enable its advice to be tendered before it was too late. Answering on behalf of the Chancellor, the Financial Secretary to the Treasury, John Boyd-Carpenter, concluded that a Commission that gained its authority through the standing and reputation of its commissioners was preferable to one in which compulsion was used to ensure that it was consulted. This the RFAC agreed with, concluding that ‘The powers of the Commission, like those of other Royal Commissions, are advisory not judicial; of investigation, not of action’. Moreover,

If it were to be given statutory powers, it would have to be changed into a large bureaucratic machine with inspectors, adjudicators and the whole apparatus of control similar to that now invested in the central and local planning authorities.

In such circumstances, it was concluded, ‘its value as the ultimate advisory body would be lost’.

Conclusion

Looking back at the first 60 years of the work of the RFAC, it is possible to make 2 concluding evaluations, the first concerning what it actually was, and second what might have been. Taking the actual experience and impact of the RFAC first, the organization represented an important innovation in the governance of design in England. Before it existed, various national committees and local arrangements had sought, through forms of peer review, to engage with and improve the design of development, but these arrangements were ad hoc and short lived, and never amounted to a national commitment to better design in the built environment.

The RFAC, by contrast, constituted a standing royal commission with a dedicated mission, and therefore also represented a strong national statement that design was important, and that the country was willing to invest (even if minimally) in trying to ensure that the standard was improved, at least for the most significant national projects. Whilst these efforts were modest in the beginning, they gradually expanded, as did the size of the Commission itself, so that by the 1980s, well over 100 schemes per year were subject to design review, many thousands over the organization’s lifespan. Furthermore, although much of the RFAC’s efforts and advice during this period were confined to the realms of aesthetics, and the relative merits of individual decisions remain open to question, in general, the emphasis of the Commission on the importance of local context, sensitive contemporary design, and the human experience of place never wavered.

During its first 60 years, this advice was often against the spirit of the times, but increasingly it became mainstream in the UK. Writing in The Spectator, and looking back on the work of the RFAC during this period, Gavin Stamp agreed, writing

When I began the research for this article, I was rather minded to see the RFAC as an effete quango, but I now have no doubt that over the years it was usually on the side of the angels and that, had its advice been taken more often, London and England would be the better for it.

Whilst less tangible than its impact on the projects it saw, in this period, the RFAC developed and refined the processes of design review that it became synonymous with. This ‘process’ based contribution towards the practices of design governance should not be underestimated, particularly as these processes have become mainstreamed in the UK, and internationally, and continue to influence, for good or ill, the design of development.

Turning to what might have been. Although in an essentially historical account such as this, speculation on alternative historical paths may seem misplaced, in this case, the stark reliance of the RFAC for 60 years on just one tool – design review – to influence design quality on the national stage, could be viewed as portraying a lack of ambition and as an opportunity lost. It might also be viewed as an indicator of an organization that became a little too comfortable in its role and perhaps a little lazy. Whilst its ‘good work’ on design review continued throughout the period covered by this paper, and increased in volume to a point where it had no capacity even to write its annual reports, this was arguably at the expense of any attempt to be more proactive in its work, to innovate in its approaches to design governance generally, or to engage with other tools that might have had a complimentary or more decisive impact on meeting its mission: to improve public amenity and the artistic merits of new development in England and Wales. But whilst it is possible to speculate that the organization could have achieved more if it had been a little less invisible on the national stage and a little more proactive in how it went about its work, it is also possible to conclude that when it did (on both counts), the organization did not last long. That is the story of the second paper in this pair which recounts how, in the neo-liberal era and across its last 15 years, the Commission substantially changed its role and profile without modernizing its operations, and ultimately paid a heavy price.

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