



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

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Dear Sirs

DRAFT ECO-TOWNS PPS

The Institute of Historic Building Conservation (IHBC) is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

Thank you for inviting us to participate in this consultation.

The Institute has great concerns about the relatively low importance that heritage issues has been consigned to in the draft PPS. We do not agree with the statement at paragraph 26 of the Introduction "...[historic environment matters] are considered to be matters of regional and local significance, which will be handled at the appropriate level of plan-making, and will be taken into consideration in the decision making process". We agree with the suggestion in the Sustainability Appraisal that a separate section on the historic environment should be included in the PPS. It is not clear to us why biodiversity and green infrastructure, which also have separate national guidance, have been given separate sections in the draft PPS and not the historic environment.

It seems to the Institute that the importance of historic landscapes are too often overlooked both as to their significance and their range. It is therefore a serious shortcoming of the draft PPS that it does not recognize that there may be historic environment issues which should be considered at the strategic level. It is not possible to "pay special attention" to the historic environment adequately, as decision makers have to do, if major strategic decisions have already been taken without reference to them.

In paragraph 3.2 of the draft PPS, historic environment should be included in the list of matters to be addressed with reference to PPSs. Given the statement at paragraph 26 of the Introduction it is very remiss that historic environment is not included here.

It is probably that the area of many eco-towns will include elements of a heritage nature. These might include historic landscape, battlefields, parks and gardens, ancient monuments, archaeology, listed buildings and conservation areas. In accordance with the suggestion in the Sustainability Appraisal, it is essential that the PPS has a section on historic environment (we suggest, for the purposes of the logical flow of the document, at paragraph 4.17a) pointing out the need for reference to PPS and circulars on the pertinent topics.

In deciding whether a site for a proposed eco-town is suitable, and as a tool in the masterplanning process, historic landscape assessment should be recommended in the PPS as the appropriate tool. These have been completed in many areas already. Where they have not been ad hoc assessments should be required.

Paragraph 4.1 states that eco-towns should be near and well connected to existing settlements. As most existing settlements will have economic and social vulnerabilities and opportunities, it is unacceptable that the planning of the eco-town should not take into account the constraints created by this proximity. The Institute is particularly concerned that the historic environment of existing towns should be protected from harms that might, for example, be caused by shifts of activity patterns away from them or over-stretching of facilities through, for example, traffic generation. It is essential, therefore, that eco-town proposals be subjected to rigorous historic environment appraisal to ensure that such impacts are minimised. Such appraisal should also include examination of the impacts of the proposal on neighbouring smaller settlements.

The draft PPS does not deal adequately with green infrastructure. This should not be seen just as a matter of requirements for the quantities of various aspects. The section should make it clear that the whole design of the eco-town should be based on going with the grain of the existing landscape, reusing unused elements and restoring those that have become despoiled.

The draft PPS defines at length the technical standards required for new housing. There is however no reference to housing mix. The Institute's view is that eco-towns will not succeed unless they are socially and demographically balanced communities and the correct mix of housing is essential to achieve this. Proper attention must be paid to the housing needs of both the proposed eco-town and the wider community through housing market assessment. The PPS should deal explicitly with this issue. With the viability of so many of the prospective eco-towns being at best unproven, a rigorous method for ensuring that they do not develop as mere market-led housing estates is essential.

Yours faithfully

A handwritten signature in black ink that reads "James Caird". The signature is written in a cursive, slightly slanted style.

James Caird
Consultant Consultations Co-ordinator