



**Royal Commission Study on the Urban Environment
Response of the Institute of Historic Building Conservation
August 2005**

A. What is the current state of the urban environment - what are the negative environmental impacts of urban living inside and outside the urban area?

1. Geographical scope of the study.

Whilst the population thresholds are useful to provide a focus for the study, it will also be necessary to take account of small urban settlements and the urban fringe if a more comprehensive understanding is to be developed.

2. Which environmental issues are most pressing in urban areas, and how are they being addressed? What is the overall environmental profile of urban areas? Are new environmental issues emerging that have been neglected or are little understood?

Traffic growth – Congestion not only harms air quality, but also places pressure on scarce land resources, leads to the public realm being dominated by parking space and other traffic infrastructure, and harms amenity through noise and disturbance. Such issues can particularly harm the character and appearance of historic areas.

In new development, there is often a conflict between meeting car parking standards and achieving good urban design with high quality streets, public spaces, and amenity space.

Lack of choice and quality of housing – Only a small proportion of new housing is designed by an architect or has an input from an urban designer. Volume house builders have been slow to develop new markets or to cater for diversity. New markets such as inner city apartments or radical conversions of terraced housing have tended to have been developed by specialist developers, such as Urban Splash's schemes in Manchester, Liverpool and Salford.

Embodied Energy and Landfill - There is a massive investment of embodied energy in urban areas. A typical Victorian House contains energy equivalent to 15,000 litres of petrol¹. Demolition and reconstruction leads to the loss of that energy investment and further use of energy for new materials and construction. However, it also contributes to landfill. Indeed, demolition and construction contribute to 24% of established total annual waste in the UK². The refurbishment of existing buildings is therefore one of the most sustainable forms of development.

Interestingly, older housing is also cheaper to maintain, costs £/100m² being:

Victorian House: £2,648.00

Inter-War House: £3,112.00

1980s House: £3,686.00³

Demolition – In addition to the loss of embodied energy, uncoordinated demolition can harm sense of place and create a degraded environment. Demolition should be classed as development under the planning acts, making it subject to the need for planning permission.

Design - Unsustainable design and use patterns have been common problems in the 1980s and 90s. Well established areas tend to have finer grains of use. They are also geared more to pedestrian use, with rear of the pavement frontages and permeable breaks in large blocks. Recent development is more likely to be single use or of limited mix of uses. This is partly due to the nature of development finance and market preferences of developers. There are many examples in most UK towns and cities of car-orientated development. Large areas of land are dedicated to single uses (such as retail) and characterised by large sheds set in car parking. In some instances,

¹ Measurement of Residual Embodied Energy in Heritage Housing, BRE, September 2003

² DEFRA web site

³ English Heritage, Heritage Counts 2003

main entrances are located to the rear rather than facing street frontages. This necessitates those arriving on foot or by public transport walking around the building or through frontage car parks. Thus, the pedestrian is given secondary status.

Regenerating inner cities - In the early twentieth century, there was a strong trend for people to move from city and town centres into expanding suburbs. In the latter half of the twentieth century, traditional industrial core areas increasingly fell into disuse and dereliction. However, during the 1990s and early part of the current century, there has been a marked tendency for inner city areas and traditional industrial areas to be repopulated. Areas such as Castlefield in Manchester and the Ropewalks in Liverpool illustrate this trend. Both areas suffered in the 1970s and 80s from acute market failure, low value uses and high degrees of vacancy and dereliction. In both instances, the areas are transforming into prosperous, mixed use places, including 'city living'. Common themes to both of these and similar areas include:

- Large-scale regeneration and structural economic change have been led by new, smaller, more specialised and entrepreneurial developers rather than by more established, mainstream developers. These have made use of carefully selected professional teams, with high levels of expertise in design, conservation, public realm works, etc
- New markets have been identified by these developers, especially relating to inner city living, high quality restaurants, bars and leisure facilities, and high quality, specialist commercial and office space. There has been a particular emphasis on urban quality.
- In contrast, mainstream developers have been poor at identifying new markets, especially markets associated with younger populations. They have instead concentrated on 'safe' established middle markets. However, mainstream developers have in some instances followed the example of the newer breed of developers and attempted to imitate new types of development, with differing degrees of success. To their credit, some volume house builders have established specialist urban teams, with a greater emphasis on design quality.
- The most successful schemes involve partnership of entrepreneurial, quality-orientated developers, skilled design and professional teams with high levels of expertise, and enlightened local authorities employing capable professionals. In areas of market failure, constructive funding mechanisms are also necessary.
- The public sector has often contributed through economic development strategies and strong master planning, with an emphasis on mixed uses, including both daytime and evening type activities. In addition, significant investment of public funds in the public realm has been necessary, helping to create confidence for investors.
- There is an emphasis on design and heritage-led regeneration. Many of the new breed of developers target historic buildings and areas as a basis for their product and image. There is often an emphasis on the creative conservation and adaptation of historic buildings, especially industrial structures. Urban design is seen as very important, especially the creation of a high quality public realm, including new public spaces, suitably designed to accommodate social and cultural activities. Professional teams are carefully selected for their design and conservation skills.
- There is a considerably above average standard of contemporary architectural design. In some instances, high profile new landmarks or conversions of important historic buildings have helped raise the profile of areas. Examples include Walsall Art Gallery, Salford Quays (the Imperial War Museum and Lowry Centre), the Baltic Flour Mill in Gateshead, and the Tate Modern Art Gallery. There are numerous other examples around Britain.

•Both developers and public authorities have focused on the surrounding context in terms of urban quality, economic performance and existing communities. In contrast, some mainstream developers have very limited interest outside of their own site.

Housing Renewal – Housing renewal is a key issue at present, with potential to either enhance or harm local communities and economies, and with potentially massive implications for landfill and use of resources. The IHBC is pleased to note the current movement of housing renewal bodies from crude supply and demand approaches to older housing towards a more community and economy orientated approach. Mass demolition clearly carries risks of repeating the mistakes from a generation ago. In the interests of sustainability, IHBC considers the following should guide decisions on housing renewal:

- The impact on nearby town centres and neighbourhood centres
- The impact on local communities
- The energy and landfill implications

Demolition should not take place unless other solutions have been fully considered. Where demolition is the chosen option, it should not be undertaken until there is a clear action plan to redevelop the area. Redevelopment needs to be phased to avoid undermining nearby town and neighbourhood centres.

3. In a modern industrial society, do urban lifestyles put more or less pressure on the environment than lifestyles of similar affluence and aspiration lived in the countryside?

It is easier to provide a range of modes of public transport in urban areas. There has often been a decline in public transport provision in rural areas, in some instances leading to isolation and difficulty in accessing many facilities. Groups without access to a car include the old, the young and those on low incomes. Public transport links between rural and urban areas are not always economically viable and public support is necessary to provide such services.

Urban areas provide a concentration of facilities and employment opportunities, sometimes in the same area, thus reducing the need for travel. This principle lies behind the concept of urban villages⁴ and to an extent the Government's Sustainable Communities policy.

Rural areas provide cleaner, less polluted air, scope for recreation, some employment opportunities, and a life style that many people working in urban areas choose (commuters). Unfortunately, this can lead to property price inflation and less reliance on local facilities such as shops and pubs.

Consideration should be given to making holiday homes a separate use class to ordinary dwellings in the interests of protecting provision for local communities.

Poor design in new development in both urban and rural areas often compromises sustainability. Comparisons between sustainable lifestyles are to some extent unnecessary. Urban and rural areas are mutually reliant and should be considered as part of the wider whole. The real need is for enlightened planning policies (and use of Section 106 of the Town and Country Planning Act 1990) to encourage mixed use, public transport provision, pedestrian convenience, etc. Reuse of historic buildings is of course one of the most sustainable forms of development in both urban and rural areas.

⁴ *Urban Villages*, Urban Villages Group, 1992

4. Which aspects of urban environmental pollution are most important in terms of their negative affect on human health and well-being?

Air quality is clearly a key concern. As discussed, mixed use is one way of reducing journeys. Efforts should also be made to avoid the public realm being dominated by car parking and transport infrastructure. For example, traffic has been partially or completely removed from public squares in London, Birmingham and Manchester.

The quality of public transport is also important, potentially reducing the quantity of traffic on the roads and associated air pollution, causing detriment to health and damage to buildings.

Transport infrastructure often dominates public spaces, reducing their amenity value to local populations. There should be a greater emphasis on alternative modes of transport in new development.

Landfill is a further problem. As stated above, reuse of historic buildings is one of the most energy efficient and sustainable forms of development, avoiding unnecessary landfill.

5. How could the urban environment be improved to benefit physical and mental health, well-being and quality of life?

There needs to be a better appreciation by Government at all levels and of funding and regeneration agencies of the importance of quality of place. Research is being undertaken by the Yorkshire Forward RDA and the ODPM into this issue. It is not merely coincidence that areas offering better quality environments are better able to attract investment, better paid employment, and skilled people. In contrast, poor quality environments are usually associated with population decline, low value investment and low pay. Key elements of a high quality environment include a well designed public realm including public spaces, creative new architecture, attractive green spaces networks, and a well maintained historic environment.

Numerous research documents have established the contribution made by high quality urban environments to local economies, quality of life, and sustainability⁵.

Green belts serve important functions in protecting the character of existing urban settlements and maintaining access for urban dwellers to open countryside.

6. Is there evidence that deprived urban areas are exposed to greater levels of environmental pollution and/or a poorer local environment?

Poor quality urban environments are associated with market failure, low levels of pay and low value investment. Local populations have limited opportunities and choice in employment, housing or leisure provision.

The role that the historic environment can play in proving new opportunities, economic growth and attracting investment was accepted by the ODPM Select Committee in 2004⁶. Research carried out in the USA has also provided strong evidence of the linkages between local economies, social inclusion and the historic environment⁷.

⁵ These include: *The Value of Good Design* (CABE, 2002), *Heritage Dividend* (English Heritage, 2002), *The Heritage Dynamo* (Heritage Link, 2004).

⁶ *The Role of Historic Buildings in Urban Regeneration* (ODPM: Housing, Planning, Local Government and the Regions Committee, 2004).

⁷ *The Economic Power of Restoration* (paper by D Rypkema, 2001).

B. What changes are needed to reduce the negative environmental impacts of urban areas and to increase their positive contribution to the environment, health and well-being?

7. What major policy developments are on the horizon over the next 5 to 10 years that might affect the urban environment?

The review of Heritage Protection being undertaken by the DCMS and ODPM provides an opportunity to recognise the social and economic benefits of building conservation. In particular, the role of historic places in delivering more sustainable development should be a central theme. In particular, conservation should be given a statutory basis, similar to planning.

8. What information exists on the other trends that will shape our urban areas over the next 10, 20 and 50 years?

Information technology is clearly a significant area for research, in particular its impact on town centres as more people buy items on-line.

Traffic growth forecasts are clearly worrying, with implications for air pollution, use of scarce land resources, impact on public spaces, economic performance, etc.

Sustainability is likely to become an increasingly dominant issue. Changing climate, exhaustion of finite resources and the need to protect living standards will all necessitate policy changes.

9. What measures should be taken to make cities more environmentally sustainable 10, 20 or 50 years into the future? What would these urban areas be like and what would be the social and environmental consequences?

There should be an emphasis on more sustainable forms of development, in particular building refurbishment. Fiscal incentives should be introduced to encourage refurbishment, especially of historic buildings and areas. This requires changes to the VAT regime in particular, as recommended by the ODPM Select Committee⁸.

There also need to be an emphasis on high quality design and the IHBC welcomes the new Planning Policy Statement 1⁹ and the Government's proposal to introduce design and access statements¹⁰.

10. How will urban areas be affected by climate change?

Coastal areas are clearly at risk from rising sea levels. Floods in recent years have caused millions of pounds worth of damages to urban and rural areas, including historic towns and villages.

11. To what extent will conventional or near-market technologies be sufficient to meet environmental goals and make cities of the future environmentally sustainable?

Many developers have been slow to adopt green construction techniques or to incorporate sustainable principles into site planning. The short-term nature of much development means that the emphasis lies firmly on reducing initial capital outlay rather than considering life-time costs of occupying a building. The BRE has undertaken much research on this issue¹¹.

⁸ *The Role of Historic Buildings in Urban Regeneration* (ODPM: Housing, Planning, Local Government and the Regions Committee, 2004).

⁹ Planning Policy Statement 1 – Delivering Sustainable Development.

¹⁰ Changes to the Development Control System Second Consultation Document (ODPM, 2005)

¹¹ See www.bre.co.uk

A combination of stronger controls and fiscal incentives is required if more sustainable forms of development are to become part of mainstream practice. At present, due to the limited use of green construction, products tend to be disproportionately expensive. This would change if such products were widely used.

12. Can high-density developments offer a more environmentally sustainable future that is also desirable for householders?

The trends to repopulate inner city areas and town centres demonstrates that high density, apartment-style living can be the preferred option for many people. However, very high quality residential developments are still the exception rather than the rule. Most house builders do not use qualified architects or urban designers. There is therefore a problem with lack of choice in many areas.

Traditional terraced housing areas provide high densities and good quality accommodation in many instances. The recent opposition to proposed clearance schemes in housing renewal areas indicates the public's liking for such housing. Terraced housing provides more affordable accommodation and caters for a wide range of people.

13. Can design codes play a significant role in improving the environmental sustainability of urban areas? If so, what should they look like?

Design codes may be useful providing they are sensitively applied, take full account of local contexts, and avoid being over-prescriptive or suppressing creativity. Design codes could be used to require more sustainable layouts, for example ensuring main entrances are located to provide convenience for pedestrians and public transport users.

14. How can construction be made more efficient in terms of natural resource use and waste minimisation?

There is a need for better controls through planning and building regulations to encourage green construction (see above comments).

In particular, there should be an emphasis on the reuse of existing buildings and on incremental change rather than comprehensive redevelopment.

15. How can the environmental impact of buildings in the domestic and commercial sectors be reduced?

See above comments on encouraging refurbishment and green construction.

16. How can environmentally sustainable transport systems be encouraged?

Many historic areas developed at a time before motor vehicles were introduced. Pedestrian convenience is therefore an intrinsic quality, characterised by rear of pavement frontages and permeable environments. In contrast, much new development is designed specifically for motorists, despite the high proportion of households that have no access to a car. Such development often has the form of 'sheds' in large car parks.

Steps to include alternative modes of transport include:

- Encouraging mixed use development to reduce the need for journeys
- Ensuring new development is designed for pedestrian convenience and permeability
- Ensuring new development incorporates cycle facilities
- Adopting an integrated transport strategy

- Providing public transport exchanges where people can move between different modes of transport
- Increasing investment in public transport including subsidies in rural areas.

17. What would be the most effective way of managing the growing demand for water? What other measures should be used to reduce demand and encourage efficiency?

See 18, below.

18. What measures are needed to improve the quality of sustainable urban drainage and sewerage, and address changing flood risk?

Fiscal incentives should be introduced to encourage green construction, including used of grey water and sustainable drainage.

19. To what extent can new technologies be harnessed to use waste for energy generation, compost, recycling, etc?

No response.

20. What is the overall contribution of urban nature to biodiversity in the UK and is it sufficiently protected?

No response.

21. Could an ecosystems approach provide practical benefits for urban areas?

No response.

22. To what extent do the technologies and systems exist to underpin such an approach? Are there examples of closed loop systems already in existence in the UK?

No response.

C. How can these changes be encouraged and achieved?

23. What is the role of the various bodies involved in urban policy?

The Government should introduce fiscal incentives and stronger controls to encourage and require more sustainable design and construction. The contribution made by the historic environment to sustainability should be recognised and conservation should be afforded statutory status. A more rigorous integrated transport strategy is essential.

Regional development agencies and other regeneration agencies need to encourage more sustainable practices, and emphasise the importance of design-led and heritage-led regeneration. This should be reflected in their funding criteria and monitoring of outputs.

Local Government should be required to place greater emphasis on sustainable development. In particular, the economic, social and sustainable benefits of good design and heritage-led regeneration should be explicitly recognised in a range of local strategy and policy documents including economic development plans and local development frameworks.

The conservation of the historic environment should be placed on a statutory footing for all public agencies in formulating their programmes and decision making. If bodies such as regional development agencies and others had to statutorily have 'special regard to the desirability of

conserving the historic environment', this would help to ensure that regeneration and new development enhanced urban environments. It would incorporate best practice into decision making in terms of delivering design-led and heritage-led regeneration.

24. What part could (a) economic instruments and (b) good practice guidance or other improved management approaches play in improving standards?

Whilst good practice guides are useful to the already converted, statutory controls and fiscal incentives are necessary if the mainstream is to be coaxed into more sustainable practices. In particular, the current VAT disincentive to refurbishing existing buildings should be removed, as recommended by the ODPM Parliamentary Select Committee¹².

25. Why have the changes that would be needed to make urban areas more environmentally sustainable not been effectively implemented before now, given that some of the proposed solutions have been around for several decades?

Planning reforms appear to have been based to a significant extent on the views of mainstream developers rather than the more specialised and entrepreneurial developers that have helped to transform inner city areas around the UK (see attached articles)¹³. Government policy and legislative reform needs to be based on a firm understanding of modern and cutting edge regeneration practices.

Responsibility for building conservation lies with the DCMS whilst planning and regeneration area dealt with by the ODPM. There has been a lack of appreciation by the DCMS of the role of conservation in delivering more sustainable development and regeneration. The Secretary of State's recent essay on heritage, *Better Places to Live* made no mention of economic development, regeneration, social inclusion, sustainable development, or the ODPM's sustainable communities policy¹⁴. Clearly, there needs to be a strong focus on these issues if the potential of heritage is to be realised.

There has been a reluctance to adopt a responsible fiscal policy based on encouraging sustainable practices.

26. Is the implementation and enforcement of current legislation and standards effective? To what extent are better regulation and enforcement required to improve the environmental sustainability of urban areas?

The emphasis of the new planning system on design is welcomed. However, this now needs to be implemented by local authorities. In particular, IHBC would recommend compulsory training for both officers and elected members involved in the planning process, with an emphasis on design, the historic environment and sustainable development.

Planning and heritage protection services need to include robust enforcement teams to ensure compliance with approved plans and to prevent harmful and unauthorised works.

27. Is the UK's science and knowledge base sufficient to support current urban policies and guide development in a more environmentally sustainable direction? If not, what are the most important gaps?

¹² *The Role of Historic Buildings in Urban Regeneration* (ODPM: Housing, Planning, Local Government and the Regions Committee, 2004).

¹³ *Modernising Planning?* (Chetwyn, D in Sustain, v05, i04), *Uncertain Heritage Outlook* (Chetwyn, D in Planning, 6 August 2004).

¹⁴ *Better Places to Live* (DCMS, 2005).

Comprehensive analysis is required of the way in which urban and rural areas have regenerated in the past decade. This should inform the priorities of both the ODPM and DCMS. In particular, the current heritage protection review should be based on a wider understanding of planning and regeneration agendas.

It would be useful to undertake research on the social, economic and environmental benefits of conservation, drawing on the research undertaken in the USA by Donovan Rypkema¹⁵.

28. Are there any other any major questions associated with the environmental sustainability of urban areas that the Commission should examine?

A comparison of comprehensive redevelopment with incremental development and refurbishment should be undertaken, with emphasis on the following:

- Use of resources and landfill
- Accommodating mixed use
- Social inclusion and catering for the needs of local communities
- Delivering sustainable development and regeneration
- Catering for small businesses, creative and high tech industries, and innovation
- Cultural development
- Providing choice and quality in housing and developing 'city living'
- Catering for minorities
- Contributing to tourism and the visitor economy
- Place making
- Pedestrian convenience and alternative modes of transport

¹⁵ *The Economic Power of Restoration* (paper by D Rypkema, 2001).

Key Message

The refurbishment of historic buildings and areas provides one of the most sustainable forms of development and urban regeneration. This includes:

- Preserving embodied energy
- Avoiding landfill
- Supporting mixed use
- Catering for local communities
- Accommodating innovation and small businesses
- Pedestrian friendly design
- High economic impact

Key Recommendations

- Conservation services should be afforded statutory status, similar to that of the general planning system.
- Demolition should be brought within the definition of development, making it subject to planning control.
- The Government should adopt a responsible fiscal policy to promote sustainable practices, particularly removing the relative burden of VAT on building refurbishment.
- Robust state aid provisions are required to allow grants to be made to trading organisations to encourage more sustainable practices, such as green travel initiatives or green construction
- English Heritage and the Heritage Lottery Fund need to expand their area grant scheme programmes as effective tools for delivering sustainable regeneration, with a focus on local communities.
- Government policy and guidance needs to recognise building conservation as delivering some of the most sustainable forms of development. And regeneration.
- The DCMS needs to integrate heritage with ODPM planning and regeneration priorities.
- Research should be undertaken into the ways in which urban areas have regenerated in recent years and the roles of specialist developers, especially inner city areas. This should inform the current heritage protection review.
- There should be a strong focus on design-led and heritage-led regeneration in the policies and funding priorities of government, local authorities and regeneration agencies.
- A more robust integrated transport strategy is required for the UK.
- Existing city and town centres should be the focus for new development and regeneration
- Public squares and spaces should be reclaimed for people where they have become dominated by traffic.
- Members and officers in local government involved in planning decisions should be required to undertake design and historic environment training.

- Housing market renewal agencies should take account of sustainability, local communities, and the economic viability of town centres in their decision making.