



IHBC SOUTHWEST BULLETIN SPRING 2022

Content

- 1. Heritage News**
- 2. Appeals and Design**
- 3. IHBC Consultation Response**
- 4. Book Review**

**Alex Marsh
Editor**

1. Heritage News

IHBC looks to the future with new 'Affiliate' arrangements: Improved support for all, and ONLY the name changes for those seeking status quo

This entry was posted in IHBC NewsBlog.

IHBC Board's call to upgrade the Affiliate category to recognise those with an 'awareness' of conservation means that from April 2022 anyone not securing or applying for assessment as an Affiliate will join a new 'supporter'-style category, but see no other change to their status, benefits, fees or opportunities to learn from and contribute to the IHBC.

... being an 'Affiliate' will actually mean something, and for those not seeking that recognition, nothing changes but the name!'

IHBC Chair David McDonald said: 'Trustees have long maintained concerns about the diverse and often blurred status of our Affiliates. We have now introduced a light-touch opportunity for any Affiliates keen to register formally their 'awareness' of conservation and the Competences and Areas of Competence that underpin those practice standards agreed in our Corporate Plan.'

'The new arrangements are offer accessible support for early career and student members, so it is right that it should be a challenge for those applicants.'

...NOT about accreditation, but about confirming a base-line awareness of how conservation works...

'For long-standing practitioners who want to remain as Affiliates, the forms can be easily and quickly filled with a little thought on our standards and processes and some selective and sensible adaptation from your own CV and practice work. If that seems too much trouble, then you may be reading more into this process than you should, as this is decidedly NOT about accreditation, but about confirming a base-line awareness of how conservation works.'

'That said, this new arrangement is a useful step in the direction of accreditation, as well as encouragement for anyone interested. While from next April, being an 'Affiliate' will actually mean something, and for those not seeking that recognition, nothing changes but the name!'

'I appreciate that for some long-term Affiliates this may seem an unexpected change to their membership status, but we believe it to be a necessary adjustment to maintain the IHBC's professional reputation. Should you have any concerns about this, do not hesitate to contact me direct at chair@ihbc.org.uk.

IHBC Director Sean O'Reilly said: 'The IHBC has now set in place the new Affiliate application process, with some half of our most long-term Affiliates already circulated with personal notices, and applications are already rolling in!'

... NOT accreditation, just a check that an IHBC Affiliate understands what conservation is...

'However if you have not been contacted personally as an Affiliate, to speed up the process, please do feel free to get your application form in now!

'Remember this is emphatically NOT accreditation, just a check that an IHBC Affiliate understands what conservation is, and what the IHBC is about, reflecting the most fundamental duty of a professional body to its membership and their clients and employers.'

'If you need to find out more, simply email us at support@ihbc.org.uk and we'll see how best to help.'

See more background to IHBC membership categories and links to relevant registration and application forms and processes at:

<https://ihbc.org.uk/join/catagories/index.html>

Levelling Up White Paper

The Leveling Up White Paper was published on GOV.UK, setting out the Governments priorities to ensure that everyone has equal economic and social opportunities up and down the country. As the Secretary of State announced, Leveling Up is Core to the Governments mission and the planning system has a key role to play. The key planning changes highlighted in the White Paper include:

- The simplification of local plans ensuring they are transparent and easier to engage with
- The consideration of new models for a new infrastructure levy
- A number of policies and powers to enable planning to better support town centre regeneration
- Improving democracy and engagement in planning decisions
- Supporting environmental protection through planning

2. Appeals and Design

The following is a re-tweet of an article by Matthew Carmona Professor of Planning & Urban Design at The Bartlett School that was published first on the Place Alliance website placealliance.org.uk.

I think this highlights an on going and pressing issues around assessment of design in the Planning system, including the lack of skills of in house staff available to Local Planning Authorities in assessing poor design, the skill of the mass housing developers to play the system including the approach to submit vague Outline applications followed by poorly supported Reserved Matters even on allocated sites, and the general anxiety of Authorities about the huge expense in fighting large Appeals following a refusal of permission for poor design.

A personal battle

For over two years I have been helping local residents fight a planning battle against a new development opposite my former home. The fight is not against the principle of development but solely on its design merits.

The site, a two storey ex-warehouse used for many years as offices, was purchased three years ago by a developer intent on demolishing it and rebuilding as a more lucrative four storey block of single bed flats. Throughout, officers supported the scheme, dismissing residents' objections that the proposed development was too homogenous (undermining the sustainable mix of uses), too intrusive and over-bearing (on neighbouring homes) and too ugly. Planning officers recommended it for approval twice and on both occasions the planning committee has knocked the scheme back. Following an appeal a Planning Inspector has now also rejected it.

In this case, as so many others, the drive to deliver more homes – even if just a very few of the many thousands the particular local authority needs to deliver – seemed to trump almost everything else, and notably design quality. To counter we constructed a comprehensive case against the proposals based on detailed townscape analysis, loss of daylight calculations, market analysis and architectural critique. Of these the inspector chose only a single narrow aesthetic ground for refusing the scheme, the presence of a somewhat incongruous mansard roof! I was surprised and delighted; delighted to win this latest round of the battle but surprised that the design of this single element was used to justify the rejection.

Rejected on appeal because of its ugly mansard
Rejected on appeal because of its ugly mansard

Is it a sign that the Planning Inspectorate is taking the new national policy on beauty to heart?

An uncertain picture

The approach of the Planning Inspectorate to design has long been a concern, with anecdotal evidence piling up that decisions have been systematically placing design quality aside when faced with local authorities that are failing to meet their five-year supply of housing land. It was something that the Housing Design Audit for England confirmed through the case studies conducted as part of the work, namely that poorly designed major new housing schemes were getting through on appeal following rejections by local authorities on design grounds.

Such cases have long fed a perception that rejecting developments solely on the basis of design is inadvisable because it opens up local authorities to the possibility of costs being awarded against them at appeal. In fact there has never been any evidence that this is more likely for applications argued on design grounds than any other, with the key test for design, as anything else, being that councils need to behave reasonably. Consequently, a carefully reasoned case against the design of a proposal is never going to be subject to a successful application for award of costs.

Despite this, the uncertainty surrounding design appeals and the lack of confidence amongst many planners to argue the case on design grounds conspire to make design only rejections and subsequent appeals relatively rare. To examine the subject, let's look at decisions included so far in 2021 in The Planner decisions digest that have been decided largely on design grounds. Five seem particularly relevant; four decided in the first half of the year.

Upholding design quality

First two appeals decided in March 2021 in which the original grounds for rejection were upheld.

The first involved the replacement of a former postal sorting office in Harrow with a six-storey building of 60 flats and commercial floor space. In evaluating the scheme, the inspector found that the proposed new building was “intrusive and overbearing” in its scale, bulk and uninterrupted frontage and criticised the layout of the development for including six single-aspect, north-facing one-bedroom flats. According to the inspector, the sun-tubes and light wells proposed to mitigate this latter concern only served to “emphasise the inadequacy” of the project. A

very clear conclusion followed that the scheme would “not achieve a high-quality building” and the appeal was dismissed.

In the second, the inspector rejected plans for 97 new homes (revised down from 128) proposed by Persimmon on the edge of Nunthorpe in Middlesbrough. Here the local authority had previously rejected the proposals on the grounds that they departed from the Nunthorpe Grange Design Code which states that new housing must reflect the density and established character of other parts of Nunthorpe. The guidance identified the appeal site as suitable for 18 dwellings per hectare, as opposed to the 33.6 proposed by Persimmon. The inspector also found that the extensive use of rear parking courts would “increase both the actual and perceived risk of crime” and was also contrary to the code. Again, a clear conclusion was drawn, this time that the proposals would “fail to achieve a well-designed place”, in conflict with the published design code, the use of which, he observed, was advocated in the National Design Guide.

The two decisions represent an interesting contrast, the first emphasising the challenges of designing at higher densities in urban areas, and the second of designing in lower densities in more rural settings. Both came down on the side of reducing density in order to properly integrate with the character of their respective localities.

Trumping design quality

Next, I found two schemes from March and June 2021 in which the pursuit of design quality was trumped by other factors, notably the pursuit of housing numbers.

In this category, first, we have a proposal for 250 new homes on greenfield land near Tonbridge in Kent. In this case the developer – Wates – contended that the council only had a two-year housing land supply while the council argued that they could count on a 4.3-year supply. The inspector ruled that the uncertainty of supply and the failure of the authority to have an up to date (adopted) local plan meant that the balance tilted in favour of approval and that the harms to the local character and appearance of the landscape should be set aside in view of the benefits of the new homes. Curiously, despite indicative design propositions being included in the application, the Inspector supported the developer’s request to largely set aside the local authority’s design policies on the basis that the application was for an outline rather than a detailed permission. In doing so he argued that as they dealt with “detailed design” rather than “matters of principle” they were not relevant. The case demonstrates the difficulty in properly testing the suitability of schemes for sites – in this case the impact on landscape character and appearance – when

consideration of design matters is considered a mere detail and held over for later consideration.

A second appeal concerned 424 new houses by Fairview Homes on two related sites in Loughton, Essex. In this case the council argued that both applications “lacked vision” and amounted to “generic placemaking” with an “over-provision of parking” undermining the pursuit of a lower carbon future. The inspector disagreed, and citing the council’s housing shortfall, noted that there would be “very significant benefits” arising from the early delivery of housing at both sites. Unlike the Harrow scheme, the fact that a minority of units would, in the inspector’s words, receive “very limited sunlight” and deliver poor living conditions was not considered grounds enough to reject the appeal.

In both these cases, design was seen as a significant factor in decision-making, but also one that could be compromised in the pursuit of other matters. They revealed housebuilders and their consultants skilled at weaving their way through the policy landscape in order to bypass design considerations in favour of delivering housing numbers.

July 20th – a turning point?

The four cases from the first half of 2021 reveal that evidence of a stronger national emphasis on design quality in planning was, at best, mixed. The appeal decisions support the anecdotal evidence that design is sometimes prioritised in national decisions on design whilst elsewhere it is considered expendable. However, on the 20th July, a revised National Planning Policy framework was published with new very clear and unambiguous words on design: “Development that is not well designed should be refused”. The test was now the achievement of ‘good design’ and not just the avoidance of ‘bad design’. In other words the dominance of ‘mediocre’ design as revealed in the Housing Design Audit was no longer considered good enough.

Has this made any difference? It is probably too early to tell, but I was heartened when, in connection with my own planning battle described above, the Inspectorate asked both applicant and objectors to submit supplementary cases reflecting on the implications of the new policy framework. In my case, the new wording striving for beauty and by implication rejecting ugliness, seems to have been decisive.

An appeal decision decided in September, relating to an application by Taylor Wimpey for 307 homes in North Finchley, offers further cause for hope. Like my own case, against officers advice the planning committee took it on themselves to reject

the proposals solely on design grounds. In this example the inspector needed to balance arguments that the shortfall in affordable housing in the Borough was significant (the scheme promised 35% affordable units) against the views of the committee that the density of the scheme, with blocks up to nine stories, was out of character with its low rise suburban context. In summing up the Inspector concluded “The Government has stated that the design of new development is too often mediocre and that systematic change is needed to ensure that design and beauty is a core part of the planning process. The national design guide and reforms to the NPPF further place emphasis on granting permission for well-designed buildings and refusing it for poor quality schemes. ... For these reasons the appeal must be dismissed”.

Rejecting mediocre design

If other inspectors follow the lead, then July 20th may indeed be a turning point. It may also represent a warning to those housebuilders (and it is certainly not all) that for too long have systematically played the system to get around previous warm words on design in our national planning policies but with little bite. For my part I will be keeping a closer eye on those planning decision letters (somebody has to!).

Matthew Carmona
Professor of Planning & Urban Design
The Bartlett School of Planning, UCL

3. IHBC Consultation Response

Consultation on Welsh Government: Proposals for the next iteration of the Warm Homes Programme

The IHBC has an important role to play in its engagement work with Government Policy development.

I have copied below a recent response to the Welsh Government Consultation on the Warm Homes Programme that highlights very clearly that the IHBC can have a significant impact on improving and providing greater understanding of the differences between modern constructed buildings and traditional buildings in this Policy development.

The Institute of Historic Building Conservation 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. We are very pleased to have the chance to comment on the consultation document.

The Institute's comments are as follows: Draft response The Welsh Government consultation on Warm homes is about balancing the need to optimise the thermal and energy efficiency of Welsh homes with the need to address fuel poverty. The pledge is to maximise air tightness, eliminate thermal bridging, optimise insulation, solar gain and natural ventilation so reducing heat loss and making homes 'fabric ready'.

Whilst the principle of eradicating fuel poverty is laudable, IHBC suggest that when implementing this scheme allowances may be required for historic building stock.

The consultation document does not differentiate between building typologies or take into account architectural significance. Reasonable provision needs to be made for historic and traditional buildings. Historic and traditional buildings should only have their energy efficiency improved to the extent that it does not risk the long-term deterioration of the building fabric, fittings or significance. In particular care should be taken with buildings that have a vapour permeable construction that both absorb and readily allow moisture to evaporate. These include wattle and daub, cob, stone and constructions using lime render or mortar.

It is important to take the following matters into account concerning historic building fabric: Old buildings were traditionally constructed with technologies handed down through generations, which allowed the building to breathe naturally.

The building fabric was constructed in natural materials usually solid walls providing good permeability and flexibility. External surfaces were designed to absorb moisture and allow it to evaporate away naturally through porous surfaces, very much like an old great coat.

This is in complete contrast to modern technologies where rain screens are designed to deflect the moisture away, very much like a plastic raincoat. The two technologies cannot be mixed and matched without causing fundamental problems.

Critically whilst exemptions and special considerations for historic and traditional buildings can be made there is no practical guidance as yet for the uplifting of requirements for traditional, historic and listed buildings. Technical information favours guidance for modern forms of construction, which from experience industry develop into off the shelf systems adopted by designers, builders, home owners, approved by building control and inappropriately applied to traditional historic and listed buildings.

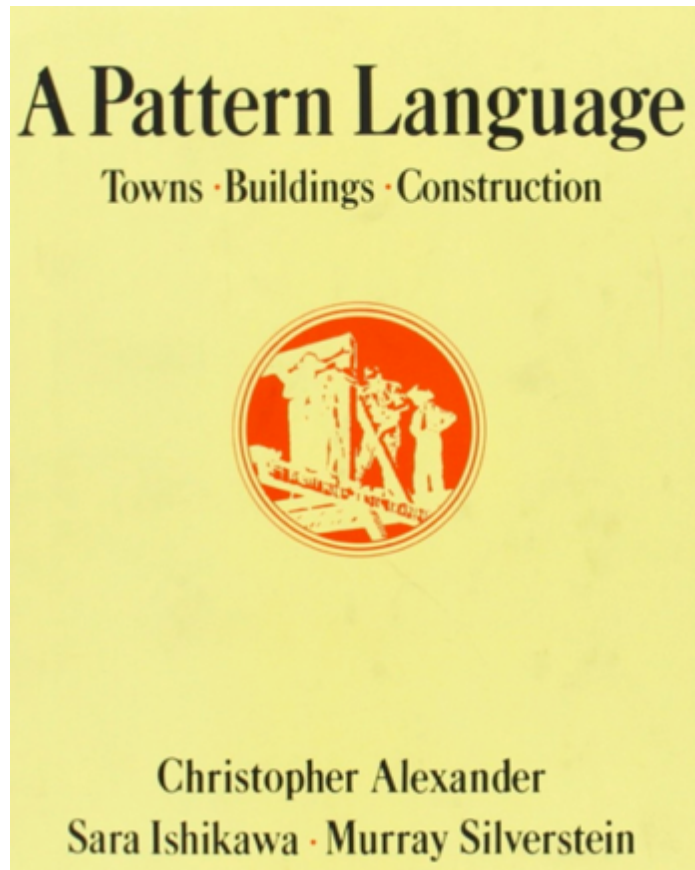
This shortcoming needs to be addressed. As there is no practical guidance for traditional buildings to date this could have the effect of practitioners favouring inappropriate modern solutions for non-vapour permeable applications and it is difficult to control and regulate without proper up to date guidance in the Document.

Even the Historic England guidance (from 2017) has been superseded by new research. Without proper guidance, the implementation of proposed inappropriate modern non breathable insulation systems will only make this situation worse. This critical aspect needs to be addressed in conjunction with the implementation of the scheme.

4. Books

A Pattern Language: Towns, Buildings, Construction: 2 (Center for Environmental Structure Series) Hardcover – Illustrated, 17 Aug. 1978

by Christopher Alexander (Author)



I discovered this book recently after reading Christopher Alexander's obituary in a Sunday paper.

For nearly 50+ years Christopher Alexander has challenged the architectural establishment, sometimes uncomfortably, to pay more attention to the human beings at the center of design. To do so he has combined top-flight scientific training, award-winning architectural research, patient observation and testing throughout his building projects, and a radical but profoundly influential set of ideas that have extended far beyond the realm of architecture.

In the process Alexander has authored a series of ground breaking works, including *A Pattern Language: Towns, Buildings, Construction* and *The Timeless Way of Building*. His most recent publication continues that ground-breaking work, the four-volume book set, *The Nature of Order: An Essay on the Art of Building and the Nature of the Universe*, incorporates more than 30 years of research, study, teaching and building. It was described by Laura Miller of the *New York Times* "the kind of book every serious reader should wrestle with once in a while: [a] fat, challenging, grandiose tract that encourages you to take apart the way you think and put it back together again."

Alexander was born in Vienna, Austria and raised in Oxford and Chichester, England. He was awarded the top open scholarship to Trinity College, Cambridge in 1954, in chemistry and physics, and went on to read mathematics at Cambridge. He took his doctorate in architecture at Harvard (the first Ph.D. in architecture ever awarded at Harvard), and was elected to the society of Fellows at Harvard University in 1961. During the same period he worked at MIT in transportation theory and in computer science, and at Harvard in cognitive science. His pioneering ideas from that time were known to be highly influential in those fields.

Alexander became Professor of Architecture at the University of California, Berkeley in 1963, and taught there continuously for 38 years, becoming Professor Emeritus in 2001. He founded the Center for Environmental Structure in 1967, published hundreds of papers and several dozen books, and built more than 200 buildings around the world.

You can use this book to design a house for yourself with your family; you can use it to work with your neighbours to improve your town and neighborhood; you can use it to design an office, or a workshop, or a public building. And you can use it to guide you in the actual process of construction.

After a ten-year silence, Christopher Alexander and his colleagues at the Center for Environmental Structure are now publishing a major statement in the form of three books which will, in their words, "lay the basis for an entirely new approach to architecture, building and planning, which will we hope replace existing ideas and practices entirely." The three books are *The Timeless Way of Building*, *The Oregon Experiment*, and this book, *A Pattern*

Language. At the core of these books is the idea that people should design for themselves their own houses, streets, and communities. This idea may be radical (it implies a radical transformation of the architectural profession) but it comes simply from the observation that most of the wonderful places of the world were not made by architects but by the people.

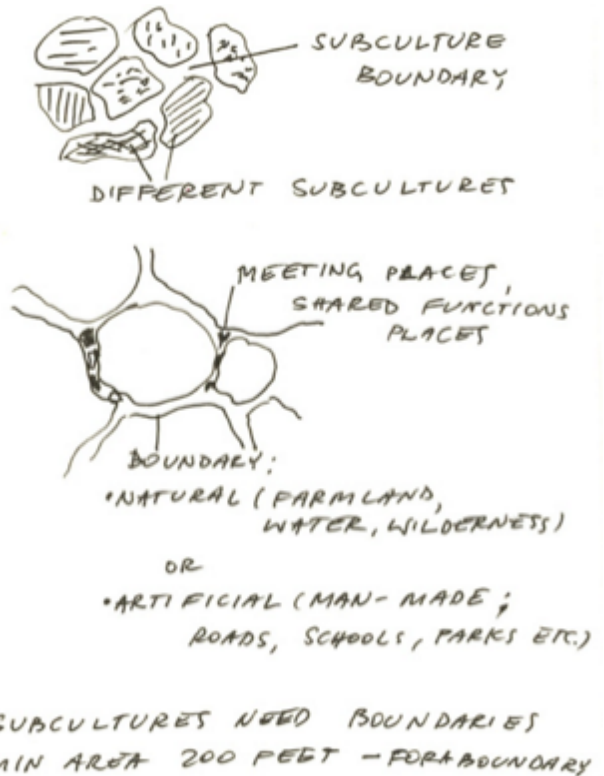
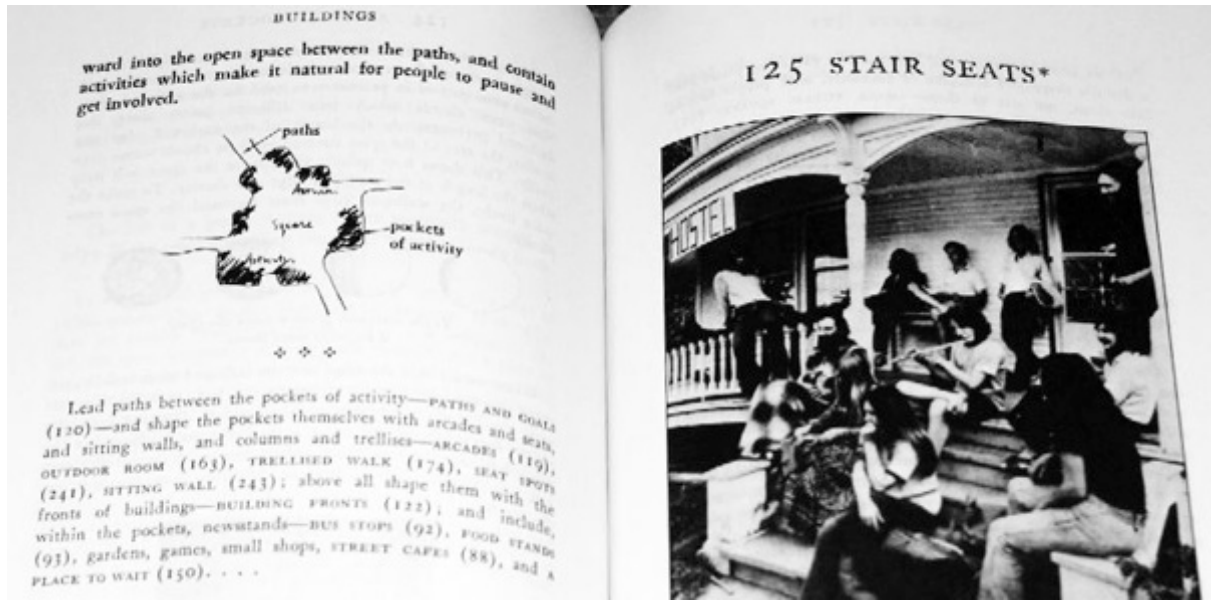
At the core of the books, too, is the point that in designing their environments people always rely on certain "languages," which, like the languages we speak, allow them to articulate and communicate an infinite variety of designs within a forma system which gives them coherence.

This book provides a language of this kind. It will enable a person to make a design for almost any kind of building, or any part of the built environment. "Patterns," the units of this language, are answers to design problems (How high should a window sill be? How many stories should a building have? How much space in a neighborhood should be devoted to grass and trees?).

More than 250 of the patterns in this pattern language are given: each consists of a problem statement, a discussion of the problem with an illustration, and a solution. As the authors say in their introduction, many of the patterns are archetypal, so deeply rooted in the nature of things that it seems likely that they will be a part of human nature, and human action, as much in five hundred years as they are today.

Illustrations from A Pattern Language





Bulletin Editors Comment

This is the quarterly Bulletin for the IHBC SW Branch. It looks to highlight relevant news and best practice in the South West and things of interest from elsewhere.

I would welcome contributions from members in the South West as the best way to make this Bulletin relevant and worthwhile. I look forward to receive contributions on any topic, be it buildings, people or anything else members feel might be relevant and of interest. Please attach relevant photographs with contribution as these help make the Bulletin of visual interest and saves a lot of words!

Please note that Bulletin is made up from a variety of Contributor's and the Editor holds no responsibility for the viewpoints expressed or information provided.

