



INSTITUTE OF HISTORIC BUILDING CONSERVATION

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Dear Sir

Consultation Paper on Planning Policy Statement 1: Creating Sustainable Communities

I refer to the above consultation document.

The Institute of Historic Building Conservation is the professional body representing conservation specialists and practitioners in the public and private sectors in the United Kingdom and the Republic of Ireland. It has around fourteen hundred members divided between fourteen branches. 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.

The draft PPS1 is generally welcomed by the IHBC. The emphasis on sustainable development is particularly appropriate and likely increasingly to be a central concern for planning. The recognition in the PPS of the role of planning in delivering a strong, stable, productive and competitive economy is also strongly supported.

However, the IHBC is disappointed at the lack of emphasis or analysis of modern, effective and sustainable regeneration practices, especially given the new title of the PPS, 'Sustainable Communities'. In particular, the guidance should stress the main elements of recent high-value regeneration schemes, where the aims of the Government's Sustainable Communities policy have been secured. These would include:

- The development of new markets, especially in city living, retail and leisure, and with a new emphasis on quality;
- an emphasis on the quality of the public realm and public spaces by both public and private sectors;
- use of design and heritage-led approaches to regeneration, especially by dynamic, entrepreneurial, specialist developers;
- very high quality contemporary design in new buildings and the refurbishment of historic buildings
- innovation and development of small businesses, especially in creative industries, and often in older properties that offer lower rentals.

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It would be useful for the PPS to explicitly deal with the tendency for under-performing areas to adopt a 'development at any cost' ethos and to neglect design and the historic environment. Where poor quality investment and development is accepted, the result is often to reinforce negative economic trends, especially low pay and unsustainable urban environments.

On the detail of the text, the IHBC would make the following observations:

Paragraph 1.5 – **social inclusion should be added to the list of things that planning should facilitate**. An example of how it can do this is through promoting established town centres, which often offer a concentration of facilities and services, good provision of public transport, and more permeable urban environments which were designed for pedestrians, in contrast to much development of the 1980s and 90s which excludes non-car users.

Paragraph 1.8 rightly highlights the need for administrative efficiency in dealing with planning applications. Paragraph 1.9 refers to quality, but in a general sense and again with reference to administrative outcomes. There is no real emphasis of quality of outcomes and delivering quality on the ground. There is now considerable evidence that some local planning authorities are compromising quality of decisions in the interests of improving performance figures. **The IHBC would suggest that these paragraphs be rewritten to place overriding emphasis on the quality of the decision itself, and to make explicit that this has priority over all other considerations.** It is better to negotiate properly, to add value to a scheme, than to accept mediocrity in the interests of faster decision making. This issue should be explicitly dealt with in the guidance.

Paragraph 1.10 deals with community involvement. **There is a need for radical change in the way the planning system engages with the community. The guidance should emphasise the desirability of involving local civic societies and other community groups in pre-application discussions for significant development schemes.** Whilst some local authorities currently do this, many exclude such groups until the application stage, and even then only consult rather than involving them directly in negotiations. Similarly, **local civic societies and other community groups should be actively engaged in the plan and policy making process, not merely consulted on completed drafts.** Suggested methods for achieving this include undertaking market research and providing free training to civic societies, community groups and others to allow more effective interaction with the planning process (capacity building).

The IHBC welcomes the recognition at Paragraph 1.16 of the role of building conversions as well as new build in the provision of good quality new homes. **Building conversions are intrinsically more sustainable, building on past investment in capital and embodied energy.** IHBC would like to see the Government take on a more pro-active, facilitating role to creating new homes and businesses in converted buildings by reducing the burden on developers of VAT for building refurbishment works to levels comparable with new build.

In Paragraph 1.19, **it would be useful to explicitly recognise the needs of non-car users.** The planning system has often failed to adequately promote or protect the interests of users of alternative means of transport and pedestrians, reducing choice and opportunities for a large proportion of the population.

The emphasis on the historic environment in 1.20 is welcomed. However, the IHBC would prefer a more modern and pro-active stance to be taken. The historic environment has been a key element in the regeneration of all of the UK's town, cities and rural areas in recent years. In many instances, heritage has triggered high value regeneration and helped create market confidence in previously failing areas. Historic buildings and areas have delivered numerous high profile projects, providing new community facilities, new places to live, better leisure and cultural facilities and supporting small businesses and innovation. Historic environments also often offer unique settings for creative new buildings, helping to create genuinely exciting townscapes, higher national profile, enhanced image, and improved competitiveness. It should be recognised that there is no contradiction or incompatibility between conservation and growth, preservation and accommodation of change, or historic and modern architecture, providing schemes are properly and sensitively designed. **The central role of the historic environment, the public realm and good urban and architectural**

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design should be emphasised as key factors in creating sustainable communities, securing regeneration and delivering structural economic change. It is essential that historic areas be specifically recognised as subjects for sensitive and pro-active planning policies. The harm caused by insensitive interventions in historically sensitive locations should also be emphasised. Particularly in areas of high economic performance and pressure for development, it is essential to afford high priority to the historic environment. Short-term pressures need to be balanced by considerations of long-term needs and benefits.

In Paragraph 1.21, **greater emphasis should be placed on the desirability of using renewable resources as far as possible.** The high levels of embodied energy in existing buildings should be stressed (both in their construction and in the manufacture of materials). Demolition also often adds to landfill. In addition, refurbishment works often deliver better outputs for the local economy, by placing higher proportions of investment in skilled labour.

The IHBC supports the objectives listed in Paragraph 1.22 and would suggest the addition of the following:

Improve the quality of the built and natural environments through careful design of the public realm, effective and sensitive management of the historic environment and landscape, good urban design, and through positive promotion of high quality, creative and innovative architecture.

The recognition in 1.25 of the long term costs of poor development is welcomed.

The recognition of the importance of design in 1.27 is welcomed. However, **the IHBC regrets that design is no longer stated as a key objective of the planning system**, as in PPG1. It would be useful to clarify that being compatible with the surroundings does not mean copying. One of the most common failings of new development in historic areas is that it is designed as a crude imitation of the older buildings (debased historicism). Architecture should be a creative discipline against the context of opportunities and constraints created by the particular site and surroundings. The character of historic areas is often based on architectural diversity resulting from the different periods of construction, and it is essential that the planning system does not stifle new ideas. It is also essential that schemes be designed by suitably experienced and qualified professionals. The quality of a building or space arises from a coherent approach to design, a grasp of design theory and principles, understanding of the urban context, quality of materials and finishes, and attention to detail. The PPS should stress that poor quality schemes, which have clearly not benefited from a proper design input, should be refused. It would be helpful to include guidance on hierarchy – the need for some buildings to distinguish themselves and be different because of their status, function or location, whilst others should be less assertive, concentrating more on their general townscape value.

Paragraph 1.29 recognises the scope for conflict with other regulatory systems. At the end of the paragraph, it would be useful to add:

This does not mean that planning quality standards should be compromised, for example in the conversion of listed buildings, but that a joined-up approach is taken and guidance is designed to reduce the scope for conflict as far as possible.

The emphasis on community involvement in Paragraphs 1.32 – 1.39 is generally welcomed. As mentioned above, **there is a need for radical changes to the way planning involves community groups.** The role of local civic societies should be emphasised. It should also be recognised that planning is very complex and providing opportunities for training for community members can help them to more effectively engage with the planning system. It should also be recognised that there is sometimes a considerable gulf between the aspirations of local communities and those of developers. There is also often conflict between the interests of small, local and entrepreneurial businesses and those of larger national business concerns. The resolution of such conflicts needs to be fully discussed in the guidance.

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The IHBC is very supportive of the guidance contained in annex C, as a statement of general principles. The emphasis on avoiding imposition of arbitrary tastes or styles and avoiding stifling innovation is strongly supported. The emphasis on site specific design is similarly welcomed.

Whilst there are numerous supplementary documents on design, produced by Government Departments, CABE, English Heritage and other bodies, the IHBC would strongly recommend that **a separate PPS be produced, dealing with architecture, urban design, public realm and the quality of the urban environment.** The IHBC would be pleased to provide more details on the form such guidance could take.

The IHBC agrees with Government's assessment that Option 3 under the regulatory impact assessment would by far be the most preferable.

In many respects, the new PPS1 is a refreshing document, with greater recognition of the importance of quality. However, **there is a need for the Government to further modernise its approach to planning, in particular by recognising and emphasising the central importance of design and heritage-led approaches to delivering more sustainable, successful and community-orientated development.**

I trust that the above comments are helpful.

Yours faithfully

Dave Chetwyn
Consultations Secretary