



INSTITUTE OF HISTORIC BUILDING CONSERVATION

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Dear Madam

Consultation Paper on Draft PPS11 – Regional Planning

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 IHBC would make the following response to the consultation questions contained in the draft document:

i. Paragraphs 1.17 and 1.18 set out the expected format of the regional spatial strategy (RSS). Does this cover the right key points or do you think that there should be changes or additions?

The suggested format is reasonable. There is a need for output targets to be better differentiated than at present, in the interests of modernising the regeneration function. For example, it would be desirable to differentiate between housing allocations in general, and housing for specialist markets, including city living. In other words, there needs to be a stronger qualitative assessment of need in addition to quantitative targets. In the interests of sustainability, and responding to current trends in UK cities, there should be an explicit recognition of the role of building conversions in the provision of new residential accommodation. The emphasis of RSS should be on modernising the planning function to deliver high value regeneration (see answer to question ii).

Output targets have traditionally been considered as a minimum. Whilst this may be relevant in more prosperous regions, particularly the south east, it needs to be recognised that in some under-performing areas, exceeding such targets has in some instances destroyed market confidence, deterred commercial and industrial investment, and prevented the development of new housing markets. Output targets should therefore be a range rather than a minimum.

INSTITUTE OF HISTORIC BUILDING CONSERVATION

ii. Paragraphs 2.8 to 2.10 discuss the relationship between the RSS and other regional strategies and the need to join these up. Do you have any suggestions about ways of securing better integration or other examples of good practice?

There is a very urgent need to review a range of regional and local strategies, based on an understanding of recent regeneration best practice. There is little point in integrating with strategies that are out of date. To facilitate this, the Government should undertake research into recent high-value regeneration schemes around the UK (the Ropewalks area in Liverpool and Grainger Town in Newcastle upon Tyne are good examples), in particular concentrating on the role of the public realm, urban design, identifying new markets, and heritage-led regeneration in creating market confidence and attracting very high value investment.

iii. Chapter 2 and annexes D and E stress the importance of community involvement and partnership working in the RSS preparation process. Is the current balance between procedural policy and guidance right at the moment or does this need changing? In particular:

a) Paragraph 2.21 and paragraph 8 of annex D requires the RPB to hold a public conference to seek agreement to the issues identified for the review. Should this requirement be retained?

b) Paragraph 21 of annex D encourages the RPB to establish a formal group, chaired by someone from outside the RPB or a local authority and with a membership representative of the community, which is consulted at key milestones on the road to the draft RSS revision. Should this guidance be a requirement?

The IHBC supports meaningful public participation, but does not consider that the suggestions in the document for a public consultation would be adequate. A problem arises where strategic matters are involved as for many people it is not apparent how they impact on their lives. Furthermore, whilst the public is fragmented, business and other interests are often organised and can afford professional representation. We must recognise that current community involvement is inadequate and that the largest proportion of the public is effectively excluded from the strategic planning dimension at present.

A community representative on the formal group is obviously necessary, but would be a token gesture if limited to one person and if not accompanied by much stronger and more meaningful measures. For the public to provide a meaningful input, there is a need for a much more pro-active and creative approach. It will be necessary to undertake public consultation as part of a wider educational and capacity building approach (the Hackney Exploratory perhaps provides some examples of this).

iv. Paragraph 2.14 refers to the role that it is anticipated strategic planning authorities may play in leading sub-regional studies. Should we include more on how to make these arrangements effective and if so do you have any suggestions?

Sub-regional planning is essential and local authorities have a key role to play at this level. The IHBC is surprised that the guidance refers to district councils leading this role 'on occasion' only.

v. Paragraph 2.17 lists areas of work where RPBs may wish to enter into partnership arrangements with strategic planning authorities. Do these highlight the right areas of work or should there be changes or additions?

It is essential that strategic planning authorities and RPBs work in partnership to identify areas for city living, strategically important historic sites and areas (which often provide the focus for very high value regeneration), the creation of urban villages, etc.

vi. Paragraph 2.20 sets out the key features of the project plan for the RSS revision and paragraph 6 of annex D elaborates on this in relation to community involvement. Does the current text adequately describe the features of the project plan or are there others that should be included?

Referring back to question iii, the issue of community approval of plans needs to be addressed.

vii. Figure 2.1, the diagram of the RSS revision process, sets out a timetable from start to finish of thirty-two months. Is this in your view about right, too long or too short? If too long, how might we be able to speed the process up further? If too short, where in the process and on what grounds should we allow more time?

INSTITUTE OF HISTORIC BUILDING CONSERVATION

The diagram does not include any stages of pro-active public participation. This seems to be the weakest element in the draft document.

viii. There is currently no requirement for the draft RSS to be advertised in newspapers (see paragraph 2.31). Should there be? Do you have other suggestions beyond those in paragraph 28 of annex D about how the RPB can best publicise the draft RSS?

The real question is how the RSS and its relevance to people's lives can be clearly communicated to the public and how can they meaningfully influence the process.

ix. Paragraph 2.38 sets out the principle that the RPB should consider when determining whether structure plan policies should be saved beyond the normal three year period. Are these the correct ones or should there be any changes or additions?

No comment.

x. Does paragraph 3.2 adequately describe the content of the annual monitoring report or would further guidance be useful in an annex? If more guidance would be useful what should be included?

Further guidance is clearly necessary. The reports should contain qualitative analysis in addition to consideration of output targets. Targets alone can be misleading. For example, consideration of quantity of development alone would not indicate whether such development was creating better employment or merely reinforcing existing economic cycles of poor pay, poor environment, etc.

xi. Do chapters 1, 2 and 3 provide adequate procedural policy advice or are there other areas where we should set out procedural policy. If so, what are these?

It would be useful for the procedural advice to give some indication of the emphasis to be placed on different aspects of the RSS. In particular, there should be emphasis on sustainability (including targets). Clearly, good urban design and the refurbishment of existing buildings have roles to play here.

xii. Are the main aims of a regional transport strategy set out in annex B between paragraphs 3 and 4 and described in more detail at paragraphs 19 to 37 right? If not, what changes or additions should be made?

There is nothing in the list on pedestrian provision. In addition, there is no recognition of the social and economic development importance of design quality in the provision of transport infrastructure. A high quality public realm is a key feature of all high value regeneration initiatives. Often, one of the most significant barriers to regeneration is the poor environmental quality of transport infrastructure. There should also be some mention of the need for traffic management in historically sensitive towns and areas.

xiii. Does this consultation document, and in particular annex B, place sufficient emphasis on the integration of transport and spatial planning at the regional level? If not, what else should be added?

There is a structural issue needing to be addressed here. Transport planners often lack awareness of the wider environmental, social and economic context and concentrate on the physical provision of highway infrastructure rather than the wider impacts. Transport infrastructure has a significant and complex impact on a range of public policy issues.

xiv. Is the guidance on the conduct of examinations in public at annex C sufficiently comprehensive or are there areas where further guidance would be helpful? If so, what are these?

See response to iii above.

xv. Paragraph 20 of annex D draws attention to the importance of involving hard to reach groups and provides advice on how this might be achieved. Views would be welcome on how else these groups might be effectively involved, including whether any of the procedures set out in this PPS should be refined.

Whilst many of the specific suggestions are perfectly sensible, the overall programme in Annex D will still tend to pick out only those members of the community who choose to involve themselves in planning and environmental

INSTITUTE OF HISTORIC BUILDING CONSERVATION

issues. As stated at iii above, more pro-active (and targeted) initiatives are required, in conjunction with educational and capacity building initiatives.

xvi. Should there be any additions to or deletions from the list of bodies at the end of annex D that the RPB may want to consult when preparing an RSS revision?

The Institute of Historic Building Conservation should be added to the list of voluntary organisations. I note that other relevant built environment related professional bodies are on the list.

Local civic societies or heritage groups should also be added to the list (for example those registered with the Civic Trust).

xvii. Do you have examples of best practice in partnership working or advice on the principles which should be followed, relevant to annex E?

See v above.

xviii. Is the list of proposed national core indicators at annex F correct or should there be any changes or additions?

As stated above, it is necessary to introduce qualitative differentiation within output categories, such as the development of city living accommodation, and new housing units in converted buildings (a most sustainable form of provision). None of the measures deal with issues of quality. The historic environment is not addressed in the outputs.

xix. Are there any other comments you would like to make that cannot be accommodated as answers to the questions above?

There are numerous examples around the UK of areas and regions that have used design and the historic environment as catalysts for very high value regeneration and structural economic change. The North-West and North East regions have some notable examples of this, leading to an improvement in competitiveness. The draft PPS needs to concentrate far more on the qualitative aspects of development and regeneration rather than merely emulating the older quantity based approach. Whilst much of the document is sensible in its approach, it is not really aimed at modernising the planning function. In particular, the sections on public participation need to be revised.

I trust that these comments are helpful.

Yours faithfully

Dave Chetwyn
Consultations Secretary