



INSTITUTE OF HISTORIC BUILDING CONSERVATION

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Dear Sirs

Consultation on draft Planning Policy Statement 6: Planning for Town Centres

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.

Town centres are dynamic places, subject to constant change. The IHBC particularly welcomes the continuation of the plan-led approach and the sequential test in focusing investment into existing town centres. Institute members are familiar with many of the beneficial results of change in town centres since the introduction of the 1996 revision of PPG6, both in terms of investment in historic buildings and improvement to their economic and environmental contexts.

However, the IHBC is very concerned over the apparent lack of awareness in the draft PPS of modern regeneration best practice in town and city centres, in particular in regenerating previously failing sectors of such centres. Where high value regeneration and growth has been achieved, there have usually been several common factors. These include:

- The development of new market potential, especially in city living and leisure
- an emphasis on the quality of the public realm and public spaces
- use of design and heritage-led approaches to regeneration, especially by dynamic, entrepreneurial, specialist developers

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- very high quality contemporary design in new buildings and the refurbishment of historic buildings

The North-West and North-East regions have been particularly successful in the use of design and heritage-led regeneration as a catalyst for structural economic development.

This new regeneration agenda is not addressed in the draft PPS6. It is essential that new planning guidance documents include an input from regeneration specialists, with good levels of familiarity with modern practice in different regions, and an understanding of the importance of design and heritage-led regeneration.

The Institute is greatly concerned to note an apparent reduction in emphasis on the civic and historic importance of town centres in the draft PPS. In particular paragraph 2.1 of PPG6 appears to have no equivalent in the draft PPS6 other than a mention in wide ranging paragraph under 1.4 of the draft PPS. This reduction in emphasis is at odds with modern best practice, as described above.

In many towns, the commercial centres contain the bulk of listed buildings and conservation areas. Often the modern town centre encompasses the area that was the town prior to nineteenth and twentieth century expansion. Town centres thus contain key historic resources. This factor is important in giving town centres a distinctive identity and in making them attractive to visitors and investors. Historic buildings and streets are vital components in making town centres more varied, stimulating and enjoyable places to visit than out-of-town centres. They therefore underpin some of the benefits to sustainability identified in the draft PPS. Indeed, reusing historic buildings is one of the most inherently sustainable methods of regenerating an area due to maintaining the investment of embodied energy in materials and construction.

In addition, older buildings and areas can provide a wider range of rentals, including the lower rentals that are essential to accommodate new, small and specialist businesses. This is essential to create variety, choice and vitality and should be emphasised in the document.

A recent book by English Heritage, Kathryn Morrison's *English Shops and Shopping*, has underlined the importance of shops themselves in England's stock of historic buildings (Kathryn A Morrison *English Shops and Shopping : an architectural history* Yale 2003).

IHBC would contend that the historic role of town centres is of such importance that it should be highlighted as an objective in its own right or given at least the prominence within the PPS that paragraph 2.1 enjoys within PPG6.

IHBC would generally support paragraphs 2.16 to 2.18 of the draft PPG. In particular there is potential for reuse of vacant upper floors of older buildings stemming from the emphasis in the draft PPS on locating residential or office use above ground floor retail units. The proposed guidance in paragraphs 3.16 to 3.18, offering a means to fit new development sensitively within historic centres, is welcomed. IHBC would argue that the considerations for assessing the merits of proposals should go beyond simple site availability and should include reference to the character and pattern of site coverage within a historic centre. Characterisation studies and conservation area appraisals are important tools in assessing the merits of proposed new development in historic contexts and in determining the appropriate scale of development. These help to ensure that change has a positive impact and that modern buildings and uses can enhance historically sensitive areas. In the same context IHBC welcomes the provision for urban design analysis in paragraph 4 of Annex B of the draft PPS. Such an analysis could be supported by characterisation and, where appropriate, by conservation area appraisals.

The Institute would suggest that the historic environment and urban design issues inherent in new development in historic town centres could usefully be the subject of accompanying guidance. Such guidance should be based on a study of city and town centres that have used design and the built heritage as catalysts for high value regeneration and sustainable economic growth.

Yours faithfully

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