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Dear Sirs

Planning Officers Society - Policies for Spatial Plans

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 document is a good attempt to define an obviously complex range of subjects. It refers to various definitions of spatial policy/plans. It would be useful to attempt to formulate a definitive definition of the term in the document. Also, confusion could arise from the term spatial itself. Whilst some of the policies would deal with spatial matters, many economic, social and environmental issues are non-spatial in nature. **It would be useful to begin with an explanation of why the term spatial plan has been used, to help with understanding of the scope of the term.**

The document concentrates on measurable outcomes and SMART outcomes (if you can't measure it, you can't manage it – p23, 31). This is clearly sensible if outcomes are to be monitored. However, there is a danger if those writing and implementing such plans and policies are unaware of their limitations. Many of the most important social, economic and environmental factors are incapable of measurement and in some instances fairly intangible. That is not to say that they can not be analysed and better understood. Changing collective taste is clearly important when trying to plan for the future. Factors such as perceived image, and 'confidence' can make the difference between success and failure of areas, regeneration schemes, and individual businesses. **Unless the importance of non-measurable factors is understood, there is a danger that measurable targets will have unforeseen harmful impacts on social and economic well-being.**

The good practice pointers (p29-30) should emphasise that polices should not suppress creativity or entrepreneurial activity. Policies are often written with the activities of large scale, risk-averse businesses in mind rather than the newer, more entrepreneurial and smaller scale businesses that create change.

The part of the document dealing with developing a spatial portrait (p33) makes no mention of 'characterisation'. This is a concept being developed by English Heritage to define local character as a basis for managing change. **It would be useful to liaise with English Heritage to build characterisation into the document, ensuring better integration with their advisory documents**.

It should be made clear in the document that defining character is about understanding the processes that have created the inherited environment. Unfortunately, character appraisals are sometimes misused as a means to suppressing creativity and imposing imitation. This arises where the fabric of the historic environment is seen as a snapshot in time, without any understanding of the processes of change that have created it. Many historic places are characterised by diversity, resulting from changing fashions, technologies and social and economic factors, with subsequent generations often consciously rejecting what has gone before. Many design movements (including Classical Architecture and formal planning) have been imported into the UK. This needs to be properly understood and recognised in the guidance. **Inappropriately restrictive design policies are often a result of a failure to properly analyse and understand the existing environment, including architectural history and urban morphology.**

Issues to be addressed (p34) should include poor quality, badly maintained and degraded environments and the range and quality of cultural and social facilities. These factors strongly influence an area's ability to attract investment and new population.

Spatial objectives (p35) should include developing new markets in housing (city living, etc), expanding choice and convenience of pedestrians, and improving the quality and condition of the built environment.

In meeting housing needs (p36) it is essential to understand the difference between mainstream housing developers (that have generally been slow to develop new markets) and the specialist and more entrepreneurial developers that have developed new types of housing and identified new markets, especially in inner city areas.

Planning policies on housing have tended in the past to concentrate on numbers and sometimes affordability. The past decade has seen the development of new housing markets and types. Housing impacts on economic development, image, ability to attract new companies, etc. **Spatial plans should therefore concentrate on the quality of design of housing and different housing markets rather than just overall numbers.**

Under sustainability (p39), it should be emphasised that plans need to deal with the relationship between refurbishment and reuse of existing buildings with demolition and redevelopment. **One of the most effective ways of making development more sustainable is to shift the emphasis to retention and adaptation. This latter approach is often more successful in economic and social terms too, providing a range of accommodation and rentals to accommodate small business, etc.** This is demonstrated by areas like Liverpool's Rope Walks, which is a focus for city living and creative industries. In addition, it should be recognised that modern development finance and practices make genuine mixed use difficult to deliver, whilst it is impossible to deliver the diversity of accommodation and lower rentals that older areas can provide.

Section 8 of the document deals with fictional examples of spatial policy. The key spatial objectives (p74-77) are grouped under typical headings. **It would be useful to emphasise the interaction between objectives under the various headings.** For example, key factors affecting economic development performance and business confidence include the quality and choice of housing, quality of the built environment, choice and quality of cultural and social infrastructure, etc. Businesses will not relocate to an area unless it has the right image and they can also attract the people they need to employ to live in that area. Therefore, matters such as quality and choice of housing should be a key factor under growth strategy and economy and employment. Similarly, design and conservation are listed under quality of life. **However, analysis of recent trends in almost any major city would demonstrate the role played by historic buildings and areas in accommodating innovation and business development and the importance of design and a well maintained urban environment**

to attracting investment and higher value development. The recent ODPM Committee Report on *The Role of Historic Buildings in Urban Regeneration* (July 2004) emphasises the economic development and regeneration outputs of historic buildings and areas. It may be easier to demonstrate the integration between different policy areas using a diagram.

The design principles (p84) contain many sensible elements and recognise the common problem of spaces being car-dominated. There is some concern over the landscape requirement (viii) to reflect the surrounding area. Whilst this may be appropriate in areas of sensitive landscape quality, it would be an extremely odd requirement in many urban areas.

The more detailed design policy (p96-97), there is some ambiguity over which of the statements apply to urban design, which to architectural design, and which to both. **In terms of architecture, care should be taken not to suppress creativity or arbitrarily impose imitation. The word 'respect' perhaps implies subservience and 'complement' may be a better choice. The emphasis should be on the quality of architectural design, not style** (for example, coherent architectural languages, consideration of proportioning of the whole and component parts, attention to detail and finishes, active frontages, legible entrances, etc.). Too often design policies concentrate on arbitrary matters and surface decoration rather than composition and more fundamental qualitative matters. In addition, it is necessary to address both the quality of the design itself and quality of execution.

With regard to Heritage and Conservation (p101, 102), the parts of the policy relating to protection of existing fabric and character of conservation areas are welcomed. However, the sections on new development are potentially counter-productive. **One of the common problems with new development in historically sensitive locations is the tendency to debased and crude imitation, with no underlying understanding of the architectural styles being used. The wording of the policy should address this. The requirement for design to respect the local character of the area and be compatible with neighbouring buildings and spaces needs interpretation if it is not to be used to support bland and uninformed design rather than prevent it. Equally, it could be used to suppress innovative and creative design unless a clear statement to the contrary is included. The requirement to use building materials and finishes in sympathy with traditional materials, finishes and techniques is similarly capable of misinterpretation. High quality modern materials should be referred to in addition to traditional materials and it should not be assumed that only the latter are appropriate in historically sensitive locations.**

Design policy for historically sensitive locations should be about understanding the place and concentrate on architectural quality and complementary urban design based on analysis of urban morphology. It should be recognised that contrast is in many instances a contextually appropriate approach, and in some instances more sensitive than imitation, especially adjacent to distinctive landmark buildings. Where a more imitative approach is taken, the wording needs to discern between informed imitation and debased parody.

Similar principles apply to extensions of listed buildings. It would be useful to introduce the principle that extensions should enhance listed buildings.
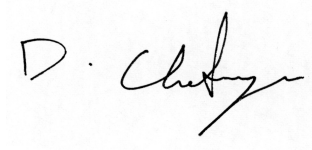
Transportation Policy (p111, 112) should more explicitly recognise the conflict between achieving good urban design and providing transport and servicing infrastructure, as recognised earlier in the document. **Transport design should form part of a holistic urban design approach, ensuring that urban quality is considered rather than just parking and highway standards.**

Producing guidance on spatial policies is clearly a difficult task, and this document is a reasonable first attempt. Perhaps inevitably, the document is very lengthy and inaccessible to the layman. It would be useful to accompany the guidance with a much shorter and more accessible document explaining spatial plans in a more general and accessible manner.

I trust that these comments are helpful.

Yours faithfully

INSTITUTE OF HISTORIC BUILDING CONSERVATION

Dave Chetwyn
Vice Chair