



Historic England

## **Building Better, Building Beautiful Commission: Historic England Evidence**

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Digital, Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

We welcome the opportunity to submit a response on the following points.

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| <p><b>1. Do you consider that securing 'beauty' should be a broad objective of the planning and development process - whether in the natural or built environment?</b></p> |
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Beauty within the built and natural environment has a proven beneficial effect on well-being and can support community confidence and cohesion as well as the economic development of effective places and so securing beauty should certainly be an *aspiration* of the planning system. However, its inclusion as an objective would require, to a degree, for it to be measurable (i.e. has it been achieved?). That is why its inclusion as a specific objective is fraught with problems. An alternative, which would have the same advantages, whilst also being measurable would be *desirability*.

In Historic England's [Heritage: The Foundation for Success](#), we were able to draw a clear line between heritage, the desirability of a place and its wider success. It identified how:

- Historic places are more attractive to businesses and visitors
- Investment in historic areas delivers substantial economic as well as environmental benefits
- Investment in the historic environment significantly improves the way people feel about places

The publication includes to a series of case studies that highlight this positive relationship. That relationship is highlighted particularly well by the Cornhill area of Lincoln. This is an area that is undergoing an inspiring transformation thanks to its owners, Lincoln Co-op. Development began with the skilful conversion of the beautiful, but largely vacant, 19th-century Corn Exchange into a stunning new restaurant venue, now occupied by the Cosy Club. The area is also set to benefit from the restoration of its many historic shop premises, and a new arts cinema will follow. The high quality regeneration of central Lincoln is utilizing its extraordinary

architectural heritage to create highly desirable and successful commercial premises and public spaces.

Additionally:

- Beauty is subjective. One person's 'monstrous carbuncle' is another's Brutalist masterpiece. How would this be measured both during the planning process and post-construction? The concept of 'beauty' is therefore considerably less helpful than more measurable objectives which contribute to people's quality of life. If these objectives are measurable, or quantifiable, they can more easily be protected. Its inclusion as an objective would also risk being an invitation to litigation.
- The same piece of natural or built environment can be transformed from beauty to ugliness simply through lack of maintenance or other incremental change.
- A building can be captured beautifully in pictures by architectural photographers, but that does not necessarily mean that they meet the needs of those that live there.

As a concept, beauty has long been considered within the planning system. In making provision for town planning schemes, the first planning legislation (the *Housing, Town Planning, &c. Act* of 1909) addressed historic conservation alongside beauty: schemes were to include consideration of '[t]he preservation of objects of historical interest or natural beauty'. Currently, the National Planning Policy Framework (2019) also makes reference to beauty, but, as was the case in 1909, it tends to refer to beauty only in relation to the natural environment: enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty; designating Local Green Spaces; recognising the intrinsic character and beauty of the countryside; and conserving Heritage Coast.

Any further incorporation of beauty within the planning system needs to broaden this approach, and reflect all that represents this quality, including the built – and particularly the historic – environment. In so doing, it also needs to be reconciled with the existing concept of amenity, with which there is some overlap (amenity is defined on the [Planning Portal](#) as 'a positive element or elements that contribute to the overall character or enjoyment of an area. For example, open land, trees, historic buildings and the inter-relationship between them, or less tangible factors such as tranquillity'). Perhaps the best way to achieve this is to include it within the concept of 'good design' which underpins Chapter 12 of the National Planning Policy Framework. This articulates policy for achieving well-designed places, and includes what might be regarded as an implicit definition of beauty in planning terms:

- 127. Planning policies and decisions should ensure that developments:*
- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
  - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
  - c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*

- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*

**2. Can you provide evidence of the best ways of creating homes and communities that have achieved a) sustainable and walkable densities b) high levels of public support c) high levels of well-being and d) environmental sustainability?**

Historic England has been directly responsible for, or worked in partnership to produce, a variety of different publications that provide evidence of how quality development within historic areas can achieve each of the four measures outlined in the questions. These include:

- Our 2018 publication, [Increasing Residential Density in Historic Environments](#), outlined approaches, based on case studies and a literature review, that have been proven to support increasing densities in historic areas.
- Our [Building in Context](#) toolkit, which was developed in partnership with what was CABE, to help local authority members and officers, developers and communities to enhance new development proposals so that they respond well to the historic area, local context and wider surroundings. It includes a range of recommendations and case studies which provide detailed information on specific elements of the design process to help improve and enhance the quality of new development in historic areas.
- [Constructive Conservation](#) is the term used by Historic England to describe the protection and adaptation of historic buildings and places through actively managing change. Our Constructive Conservation publication includes a series of case studies that show the many ways in which adapting historic buildings can contribute to job creation, business growth and economic prosperity.
- Of course, it is not just buildings that contribute to the broader success of places, and their perceived beauty and desirability. Historic England's [Streets for All](#) publication provides updated practical advice for those involved in planning and implementing highways and other public realm works in sensitive historic locations, including highways engineers, planners and urban and landscape designers.
- Our [Historic England Advice Note 1: Conservation Area Appraisal, Designation and Management](#) supports the management of change in a way that conserves and enhances the character and appearance of historic areas through conservation area appraisal, designation and management. It has been recently updated to give more information on innovative ways of handling conservation appraisals, particularly community involvement.
- Historic England's [Heritage: The Foundation for Success](#) draws the line between heritage, the desirability of a place and its wider success. It includes selection of case studies from a large portfolio of recently completed successful developments with heritage at their core.

**3. Can you provide evidence of ways of creating homes and communities in other countries, which have been successful in achieving a) to d) in question 2?**

There are numerous examples of developments in other countries which fulfil the criteria above:

- Scheepstimmermanstraat, Holland, is a much publicised example of user participation in the design process - <https://en.wikipedia.org/wiki/Scheepstimmermanstraat>
- Almere, Holland, a Mixture of custom and self-build - <https://www.theguardian.com/housing-network/2015/dec/15/almere-dutch-city-alternative-housing-custom-build>
- Bosco Verticale, Milan, Italy and associated connections to nearby business district, shopping area with public realm at Porta Nuova <https://www.stefano-boeri-architetti.net/en/project/vertical-forest/>
- Hellerau, Dresden Germany – Germany’s first garden town but modernised and adapted over time including tram/rail connections [https://www.dresden.de/en/tourism/attractions/sights/city\\_region/the-garden-city-of-hellerau.php](https://www.dresden.de/en/tourism/attractions/sights/city_region/the-garden-city-of-hellerau.php)
- Der Spinnerei, Leipzig, Germany - <http://www.spinnerei.de/> Repurposed cotton mill, mixed use for key businesses and live/work areas for artisans and art studio and gallery space.

**4. Do you consider that collaborative community and stakeholder engagement processes (such as planning for real, enquiry by design, charettes) are effective in securing more publicly accepted development? If so, at what stage of the planning and development process are they most effectively used?**

As noted in paragraph 124 of the National Planning Policy Framework:

*Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.*

Meaningful and effective community evaluation adds value to proposals, not just in securing more publicly accepted development, but in also securing publicly designed development.

However, it is vital that such engagement happens at the right phase. Too early and there is insufficient detail upon which to base comments and that lack of detail can raise expectations as to what is, and is not possible. Too late and the opportunity for meaningful influence is lost and there is a risk that the process is viewed as tokenistic. Both approaches can be harmful to the long term relationship with the community. Community engagement needs to take place at a stage where enough detail of the proposal has been developed, but there remains enough flexibility to shape what is being proposed.

Each of the tools listed in the question can be useful in helping to deliver that ambition, but with each there is a risk that the process only hears the loudest voices, or those who are already comfortable with engaging in the planning process. Meaningful community engagement needs to understand that there are barriers, both real and perceived, that prevent many affected voices from being heard and that steps need to be taken to remove those barriers. It also needs to be understood that this might not always be seen to be in the best interests of the developer and so responsibility for this needs to be accepted by the planning system.

Historic England is currently in discussions with [The Glasshouse](#) and with the Open University in the development of a research proposal that will look at different models of community engagement within local government. The recently launched High Streets Heritage Action Zones programme provides an opportunity to explore how neighbourhood/place-based strategies and building/site-based initiatives interact within the context of place-shaping. It will also look to answer the question of how can community engagement activities within the context of place-shaping be reconfigured to help shift the role of communities (local citizens, groups and

organisations) from commentators to active contributors to change and the long-term sustainability of that place.

**5. Can you provide evidence on the benefits and problems associated with introducing, and enforcing, design methods such as master-plans, design briefs and design codes, in the creation of homes and communities?**

Historic England has welcomed the emphasis on design in the new National Planning Policy Framework, but continues to press for clarity as to the geographical scales at which design visions and expectations are expected to be defined. The reference to this being in plans ‘at the most appropriate level’ suggests that a distinction is being made between strategic, local and neighbourhood plans, rather than encouraging the identification of areas of particular character. The later reference to design policies being ‘grounded in an understanding and evaluation of each area’s defining characteristics’ is generally welcome but has a similar ambiguity. Clarification is all the more important in light of the suggested use of design guides and codes (para. 126): a district-wide design guide would lack the detail to provide an appropriately nuanced understanding of local distinctiveness, and could not be the basis of the policy outlined in para. 130, namely that ‘permission should be refused for development of poor design ... taking into account any local design standards’. Any such design standards should be clearly and carefully defined, be consistent with national and local policy, and seek to ensure the delivery of new development which creates distinctive, quality places.

Master planning can help to establish principles and standards for development. However, as they are often development driven, their production is not always an indicator of high-quality design. This is unfortunate as there are clear benefits of the use of master planning, design briefs and codes as they do provide an opportunity to set the level of design and detail in development schemes coming forward. In order for them to achieve this, thought needs to be considered to how they are developed, ensuring that they not just developer led, and that there are community voices involved as well.

Additionally, one of the biggest problems associated with design codes is that, as an example, a paving material can be specified and installed by the developer, in line with the codes, but once the local authority adopts these surfaces they cannot afford to undertake repairs in the same material so inferior ones are used in their place. Consideration of on-going maintenance, both of buildings and within the public realm, is an important part of the process in the development of design codes.

**6. How ideally, could the planning and development process in England foster higher standards in design, over the long term?**

Given the proven link that exists between good design and physical and mental health ([Built Environment Design Review Insight Report](#)), it is vitally important for the success of places that it sits at the heart of the decision making process. The relationship between the place and well-being is increasingly being better understood (see also [Wellbeing and the historic environment](#))

There are a variety of tools through which that can be achieved (as outlined above), but in order to foster improved design standards over the longer term, it needs to be in the interests of developers to do so.

Aside from that more fundamental concern, there are additional steps that could be taken to improve standards:

- Develop community engagement in the process through emphasis on the role that they can play at a strategic level. That will both engender greater support for the process, and also improve the quality of outcomes;
- The requirement for substituted/revised plans to require a new planning permission, or attract a new application fee (in recognition of the resource implications for the local authority);
- Sufficient resourcing of planning departments within local authorities (with the requisite range of professional skills, including heritage and design);
- The strengthening of planning policies relating to the requirement of good design; and
- Encourage all architecture and urban design students to undertake placements working in local authorities.

**7. What first steps do you think the Government should take towards fostering higher standards in design through the planning and development process?**

Government could take steps to assess and understand the current standards of design and the ability of the planning system to support and/or improve those standards.

Since the publication of the first iteration of the National Planning Policy Framework in 2012, further changes have been made, and continue to be made, to the system in support of different policy drivers (these mostly coalesce around the need for increased rates of development). These have been happening at the same time as wider changes in the economic conditions that affect both developers and local government. More data on the impact that these variable are having on design standards will be crucial in understanding the success of existing policy, and in identifying any necessary changes. What is necessary is a robust assessment of current standards, the implications of recent changes, and a series of recommendations as to how improve the status quo. This would also need to factor in the effectiveness of the numerous government publications that are aimed at improving design standards. Whilst the Building Better, Building Beautiful Commission represents a step in the right direction, what it has not been tasked to do is to understand the impact of recent changes on design standards. That understanding is vital in ensuring that standards are not eroded by future change.

In addition, the public sector should be setting an example. Homes England should be the driving force in community-led design, providing exemplars of good practice on their sites.

*National Strategy, Historic England  
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