



RTPI

mediation of space · making of place

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23 November 2010

Debbie Williams
English Heritage
37 Tanner Row
York
YO1 6WP

Email response sent to: setting@english-heritage.org.uk

Dear Ms Williams,

RESPONSE TO: The Setting of Heritage Assets

Thank you for the opportunity to respond to the above. The Royal Town Planning Institute (RTPI) is a membership organisation representing over 22,000 spatial planners. It exists to advance the science and art of spatial planning for the benefit of the public.

The RTPI is committed to promoting the retention and protection of the historic environment and we welcome the opportunity to comment on this guidance. This response was drafted by the RTPI Historic Environment Interest Group following an internal consultation and open meeting at which the background to the guidance was explained and discussed. We have set out our response in the form of comments against the questions included within the consultation document. Although the RTPI is generally receptive to the guidance, we urge you to give further consideration to issues that have been identified within this response.

The RTPI Historic Environment Interest Group would be happy to discuss this submission or offer further assistance in developing the guidance. If you require further assistance, or have any queries relating to the enclosed or require clarification of any points made, please contact the Planning Policy and Practice Team on 020 7929 9466 or email england.policy@rtpi.org.uk.

Yours faithfully,

Matt Thomson
Head of Policy and Practice

Enc.

1. The English Heritage draft guidance is intended to assist the implementation of the policies and guidance on setting in *Planning Policy Statement 5: Planning for the Historic Environment* and the *Historic Environment Planning Practice Guide*.

(1a) Do you consider that this English Heritage guidance on Setting conforms to the Government's policies and guidance in the PPS and Practice Guide?

(1b) If not, can you explain how it diverges?

(1c) Do you consider that it will assist implementation of the Government's new policies and guidance?

The RTPI believes that the guidance is true to the spirit and intent of published Government policies and its 'pedigree' in this regard is clearly set out. There are however four general points where the document could be more helpful to guiding the audiences through the topic:

- Although it is recognised that this is a generic document intended to be useful across a number of perspectives, we think that references to positive urban design and place-making policies and the benefits that spring from these should be included.
- Whilst it is often helpful to have a document that is complete in itself, this is often difficult to achieve with brevity. Brevity will undoubtedly aid access to the document for many audiences. This is not about dumbing down but rather ensuring everyone immediately understands that what is being talked about is not abstruse aesthetics but about designing settings as appropriate spaces around the building/space in question. An opening summary or overview would be helpful but also, as this document has a number of 'to be read in conjunction with' references it seems out of place that it quotes PPS5 at the frequency and length that it does. It would be better for the readability of the document if the key context only is included in the text and PPS5 and other guides are referenced more fully within an Appendix.
- It would be helpful to have, perhaps diagrammatically and perhaps in an Appendix, an indication of how all the linked documents referred to relate together and where this and other documents sit within the hierarchy of heritage guidance. This could also indicate where there is an English Heritage document yet to be published or due for review/revision. If someone is interested in the historic and environment and they come across the Setting document first, it is at present quite unclear what they would/should gain from the other 'to be read in conjunction with' documents.

2. The English Heritage setting guidance applies the heritage values approach advocated in *Conservation Principles, Policy and Guidance* to the consideration of setting.

(2a) Do you think this approach is helpful and that it is successfully achieved within the draft guidance?

(2b) If not, what alternative approaches would you suggest?

Since the Conservation Principles document has not yet been reviewed in the light of PPS5 and since its language has been widely regarded as off-putting, any reference back to it seems unhelpful and potentially confusing. The basic approach set out in the draft guidance seems fine and could helpfully be said simply to be English Heritage current guidance rather than make mention of a dubious source. The terminology ought more clearly to relate to that used in PPS5 especially the use of 'significance,' the core term in PPS5.

3. The English Heritage setting guidance is intended to cover a wide range of circumstances, from large scale infrastructure projects to more common types of development and for initiatives such as conservation area management plans. We have drafted our guidance to cover the generality of setting issues applying to such circumstances. We have avoided additional technical guidance specific to particular types of development such as tall buildings and wind turbines, as this is included in the specific guidance we offer on these development types.

- (3a) Do you agree with this approach and, if so, have we struck the right balance to ensure our draft guidance applies to the majority of circumstances?**
- (3b) Are there additional issues that you consider should be included in specific guidance on particular kinds of development?**

The RTPPI agrees that a general approach of producing guidance that applies to the majority of circumstances is the most helpful starting point. However, it is essential that the guidance fully acknowledges that considerations of setting are very closely related to good place-making practice. Also, more references should be made to the economic impact that development within the setting of historic buildings and places can have. The illustrations make mention of a compromised potential for reusing historic buildings but this ought to have specific reference points within the guidance.

We agree that specific guidance on particular types of development should generally take the form of separate sub-documents. However, the general approach presently lacks any clarity or helpful guidance on proportionality. While some proposals clearly can have major harmful effects on significant heritage assets, these are a minority of all cases; many changes requiring a specific consent won't have materially harmful effects on the historic environment, and in these cases much less detailed analysis is required. Whilst it should be clear that a systematic approach is essential, it should not be implied that the scale of the task is generally burdensome.

4. In Section 3 (paragraphs 42 to 62) of the draft guidance we set out, as an assessment framework, issues that we consider may need to be taken into account in assessing the impact on the significance of a heritage asset of changes within its setting.

- (4a) Do you agree that these are the correct factors to consider?**
- (4b) If not, can you suggest which factors should not be considered or which additional factors should be?**
- (4c) Do you agree that the questions posed in paragraph 49 are a helpful way of structuring the assessment framework?**

The RTPPI agrees that a mechanistic or numerical system is to be avoided and a framework of questions is helpful, provided that the list is related to what has been said earlier in the document and is of a manageable length. Inevitably perhaps, whilst the framework makes it clear that setting is multi-faceted, the subsequent illustrations over-emphasise views to the detriment of other factors. Pictures will do this but perhaps a caution that illustrations have their limitations ought to be included.

5. In paragraphs 55 to 58 of the draft guidance we discuss the issue of cumulative impacts in relation to setting.

(5a) Do you have views on the practicality of the approach suggested in paragraph 58? We would particularly welcome views from Local Planning Authorities.

The RTPPI agrees that cumulative impact is an important concept to include, albeit this can have both positive and negative impacts. The RTPPI would wish the guidance to stress that cumulative impacts are best addressed through local designations, robust policy and local guidance which will give clarity and logic to the development management process. However, the practicality of the approach suggested is likely to be heavily influenced by the extent to which it is 'hidden' in a large document and the extent to which the approach is seen as 'all or nothing.' Again it would be helpful if there could be a diagrammatic approach illustrating core and possible additional issues – and this would lend itself to website interactivity, which is the way that such guidance is most likely to be found and used.

6. In Appendix 1 of our guidance (paragraphs 63-74), we provide illustrated examples of how setting can contribute to the heritage values and significance of a heritage asset, structured around a range of questions. These are not intended to provide examples of good or bad development within the setting of an historic asset, but rather to illustrate how an analytical approach to setting can provide better understanding.

(6a) Do you think this approach is helpful?

(6b) Do you have comments on the appropriateness and usefulness of any particular example?

The RTPPI agrees that the examples are useful in principle and contain some useful points. Learning derived from practical examples is also likely to improve the wording of the guidance, grounding it more in reality. However, it would be more helpful if a wider scale of examples was used – most are very large-scale – and as noted above, a caution about the inevitable over-emphasis on views from the use of pictures could be appropriate. The RTPPI Historic Environment Interest Group can also assist in generating suitable examples, drawing on the knowledge and experience of the group.