

CLG Thames Gateway eco-quarter consultation – response by English Heritage

1. English Heritage 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 to help protect England's historic environment and promote awareness, understanding and enjoyment of it.
2. English Heritage broadly supports the concept of a Thames Gateway eco-quarter. We believe that such a development could act as an exemplar through sensitive and innovative use of existing buildings and areas. The creation of a sustainable community by upgrading the performance of existing buildings and new development of high environmental performance standards and design is clearly a welcome proposal.
3. Nevertheless, we are disappointed that the historic environment is largely absent from the consultation document, and where it is referred to appears to be regarded as a constraint on achieving success in carbon use reduction.
4. We believe that this consultation offers the opportunity for the consideration of the contribution of the historic environment as part of the delivery mechanisms for a Thames Gateway eco-quarter. The objectives and standards within the consultation document should better reflect Government Policy in the emerging PPS15.

Principle Concerns

5. The approach taken to the eco-quarter in the consultation document focuses on the creation of a community of new and existing development that meets high environmental standards and protects and enhances the natural environment. English Heritage was not involved in the process of the Eco Region Prospectus and the development of the eco-quarter ideas that informed this consultation document.
6. We would prefer the more holistic approach of considering the built, historic environment and natural environment together, both in terms of how the wider environment can contribute to the eco-quarter but also how the eco-quarter can benefit the environment needs to be addressed.
7. As is set out in Government Policy in PPS15, we believe that the historic environment is not a constraint on achieving the aims of an eco-quarter. But if the eco-quarter objectives and standards remain as they are, we feel strongly that an opportunity will be missed to develop the concept for an eco-region that recognises that in the Thames Gateway any eco-quarter will consist of brownfield land and existing buildings, both of which may well have historic environment importance. Archaeology and the embodied energy of the existing buildings should also be properly considered in the development process. Furthermore, we would like to see encouragement given to the upgrading, adaptation and reuse of the existing buildings, but in such a way that the historic interest still remains apparent and can be appreciated. We believe that the research and testing we have carried out in recent years demonstrates that traditional buildings can be made more energy efficient and can meet modern energy performance standards.

Analysis of the Thames Gateway eco-quarter consultation document

Summary

8. Key Proposals: English Heritage supports idea that an eco-quarter should contain a combination of existing and new buildings. But the summary text lacks the key point that an eco-quarter also needs to be about place-shaping, including the enhancement of local distinctiveness and utilisation of local design details and materials.

9. In the Benefits for the local authority, it should again be emphasised that there are positive impacts in place-shaping that builds on the local distinctiveness of the existing buildings, whilst adapting them, to create somewhere that the local residents feel a stronger identity with.

Policy Context

10. English Heritage particularly supports the idea of an eco-region because it will be a sustainability exemplar for the existing built environment and how it can be regenerated. Where we feel the Policy Context falls short is that it refers explicitly to the Thames Gateway's unique natural landscape, and the need for 'more locally specific standards for biodiversity and green infrastructure'. There is however no mention of the historic environment and the need to similarly apply policy to ensure its identification, protection and enhancement in the eco-quarter. This is highly necessary as PPS15, in draft at present but highly to be issued in 2010, points out.

11. We would point out that one of the suggested methods of evidence-base gathering for developing eco-town proposals, and included as a necessary standard in the Eco-Town PPS, is that historic characterisation should be carried out for the area to ascertain the distribution of the historic environment on the proposed site, so informing masterplanning and layout. English Heritage has worked with the HCA on a document that explains the use of characterisation in masterplanning and shows where it has been used and how it helped create better development that protected the environment. This guidance can be found at:

www.homesandcommunities.co.uk/hca-english-heritage-guidance

12. In the future, it is clear that all existing buildings will need to be upgraded to meet high energy performance levels. There are ways of achieving this that obliterate all historic interest in certain buildings by replacing all external joinery, putting thick render on all external elevations and even replacing the roof covering possibly requiring the replacement of the roof structure. English Heritage has undertaken projects to examine more sensitive approaches to adaptation and there is a lot of advice on the website www.climatechangeandyourhome.org.

13. Is it particularly important to English Heritage that this more inclusive approach to the whole environment is taken if the objectives, characteristics and standards set out for the Thames Gateway eco-quarter become the guidelines for the rest of the UK.

Objectives for an eco-quarter

14. There are 13 objectives set out and only two, the 7th and 8th mention the existing buildings and the historic built environment. The 7th just considers the positive impact of new development upon existing buildings and the 8th "demonstrates how delivery of

sustainability can go hand in hand with... the historic built environment”. This suggests the historic built environment is a constraint on achieving sustainability.

15. Conversely, in the 5th it states “an enhanced natural environment can generate and support economic growth and investment, benefiting local communities, developers and businesses”!

16. English Heritage would argue that the embodied energy in existing buildings needs to be appreciated and the sustainable approach is to retain, adapt and reuse them to provide the buildings needed in the eco-quarter to provide the community with some of the facilities it needs. This is the approach taken in the coming PPS15, and an additional point should be inserted to set this out.

17. There is also no mention of Place or Place Shaping and the need to recognise and utilise local distinctiveness so that the eco-quarter is “of the place” and its development works “with, rather than against, the grain of the landscape”. This should be another objective and one that links to a requirement to carry out historic landscape characterisation.

Eco-quarter characteristics

18. For the first of the six objectives we would urge the inclusion of “and the historic environment” at the end, because again, this is the Government’s Policy as set out in PPS15. We agree with the second objective, but wonder whether it could not be strengthened by mention of the reuse of existing buildings as a sustainable approach and the use of existing local distinctiveness to ensure that new development fits into its context. The 4th objective on high quality place should take on board existing best practice as set out in World Class Places published by DCLG & DCMS , both the main document (May 2009) and the Action Plan (November 2009). We support the 5th objective on strong community focus especially involving the community in to give them better quality public realm which they then help maintain. The 6th objective states that “It (the natural environment) should also inform the regeneration of the existing built environment”. English Heritage believes that this should be rewritten to suggest it is the historic and natural environment that should do this.

Eco-quarter standards

19. This section very noticeably excludes mention of the whole environment that is the natural and built environment together, which in our view is a significant omission. We would recommend the insertion of a further standard requiring a historic characterisation exercise to inform the masterplanning of development, as per the Eco-towns PPS. The results of such an exercise could also feed into certain other of the proposed standards – for example that covering ‘Well designed development and good urban planning’. This should also be widened to ensure that development reflects its context and draws on local distinctiveness to help create a sense of place.

20. The next standard on ‘Green infrastructure and biodiversity’ which gives extensive coverage to environmental issues also covers historic environment issues, such as the third point “Supporting the maintenance and enhancement of local landscapes and historic character”, which itself should have “and local distinctiveness” added on its end. It would be helpful to either make this standard reflect the whole of the environment or put in a short additional standard to cover the treatment of the historic environment.

21. The standards for Existing Development we would agree with three aims but they need to each be qualified with a statement that sets out the balance between achieving these aims and protecting and enhancing the historic environment, as is set out in the forthcoming PPS15.

22. The standards for New Development, needs again to be qualified with a consideration of the character of the site and any consideration of any historic environment issues, which might include below ground archaeology. We would suggest putting something to this effect in the last point on brownfield land and land remediation adding to the last phrase “bearing in mind any biodiversity value of the land”.

Identifying an eco-quarter

23. EOI supporting detail should include a historic characterisation of the area, which would then feed into the sections on the existing built domestic and non-domestic development. It should be made clear that in this consideration of the existing environment should be on the basis that existing buildings should be retained, adapted and reused as a sustainable approach. The approach to achieve this should be set out, and needs to identify appropriate approaches that for buildings of historic interest carry out the changes without emasculating this historic interest. As stated earlier, many of the approaches to doing this can be found on the www.climatechangeandyourhome.org website.

Consultation questions

Q1. Do you support the concept of an eco-quarter? Please provide reasons for your view?

English Heritage broadly supports the concept of an eco-quarter. This approach offers an excellent opportunity to create a new community with environmentally stretching standards. However, for such a community to be entirely successful, the approach taken must reflect the environment in its widest sense. The historic environment should form part of the evidence base and preparations for the eco-quarter.

Q2. Do you consider that the proposed standards will allow for an achievable eco-quarter?

We have reservations about the standards because they do not consider the positive contribution of the existing buildings nor seek to protect or enhance the built historic environment. It is clearly important that eco-quarter proposals demonstrate convincingly that they deliver benefits to the economic, social and environmental well-being of an area, and we are firmly of the opinion that the environmental considerations of such an impact should include those affecting the existing built and historic environment rather than just the ecological that a narrow interpretation of the suffix ‘eco’ could be taken to imply. The standards should be amended to reflect this – see paragraphs 19-22.

Q3. Should any of the standards or characteristics be different?

See paragraphs 19-22.

Q4. Are there any standards or characteristics which are missing?

We have suggested a standard on the historic environment.

Q5. Are there any standards or characteristics which are not essential?

No

Q6. Are the standards and characteristics articulated clearly enough? Should they be more or less prescriptive?

We have suggested above amendments to some of the standards. Generally we feel they are prescriptive enough.

Q7. Do the standards and characteristics allow enough flexibility to be interpreted to fit individual local circumstances?

Potentially. The inclusion of a further standard requiring historic characterisation to be carried out and the results used to inform masterplanning would ensure the identification of local distinctiveness of the area.

Q8. Do you think the proposed size of an eco-quarter is about right - up to 2,000 homes, both new and existing - to deliver an exemplar? Please provide reasons for your view.

We think that 2,000 homes is about the right size of a community that can identify around a place which has its own distinct identity.

Q9. Do you agree that submitting an expression of interest at the level of detail proposed can be achieved with bidder information and resources already available to a local authority?

We feel that some baseline evidence work needs to be carried out to identify the characteristics of the area, and its environmental interest/potential.

Q10. Do you have any recommendations regarding information which should, or should not be, required as part of the expression of interest?

Please see above about our suggestions for some evidence gathering work.

Q11. What additional support is needed from HCA, Government and any other organisations?

We feel that it is essential that the eco-quarter bidders are able to talk to those who are working on how to upgrade traditional buildings in non-standard ways that maintain their historic interest.

Q12. How realistic is the timetable outlined above, including the implementation being in 2011?

This is beyond the remit of English Heritage.

English Heritage
January 2010