



Consultation Response

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Siân Phipps
Clerk to Enterprise and Business Committee
National Assembly for Wales
Cardiff Bay
CF99 1NA

Dear Colleague

Enterprise and Business Committee – Inquiry into the Regeneration of Town Centres

Thank you for notifying us of this consultation. We welcome the opportunity to comment. We have italicised the terms of reference, which provide a helpful structure. Our comments are set out in plain text.

The terms of reference are:

- *What approaches have been followed to successfully deliver and finance the regeneration of town centres in Wales? Are there lessons to be learned from elsewhere?*

There are all too few examples. Some good practice in both the physical and community regeneration of town centres exists though it is often due to independent effort. See our further comments at the end of this section.

By way of overview, Aberdare, Narbeth and some elements of Cardigan have worked well and have captured the value of partnerships due to the tenacity of individuals with vision and energy. Pontypridd and Merthyr present a mixed picture. The latter has benefitted from a material upgrading of the town centre yet it lacks the balance of other amenity and cultural provision – it is entirely reliant on retail

both within and without the town. Its cultural and historical importance has been overlooked. Lessons from Blaenavon could be usefully employed. Pontypridd is a key challenge and the quality of the built environment, property and retail frontage in the town centre is poor. Conservation area work is good where it has taken place in parts of the town, but this has not been extended and the approach to improvements elsewhere in the high street have been of varying quality. It is noted however that there are currently ongoing public realm improvements on site within the town centre.

In the south east of the country regeneration efforts have in some ways served to undermine other local centres. The Ebbw Vale initiative is interesting and in many ways welcome, however its revived rail connection could have been more ambitious – this has been borne out by its popularity. This is true of many valley rail connections and more could be done where government partnerships are possible to improve and prioritise public transport availability and access. The construction of the road which bypasses Brynmawr diverts traffic from the town centre and funnels into the large scale edge of town retail park – very large in comparison to the area it serves. This has had a detrimental effect on traffic impact and the vibrancy of the town centre, which was already in decline. Future plans for education provision in the area, and the focus on Ebbw Vales are perceived locally as potentially negative. In the Torfaen area, specifically Pontypool, the quality of the urban fabric of the town is under exploited and there is an opportunity to better utilise aspects of heritage in regenerating its fortunes. An edge of town retail scheme in the area has undermined its public transport capacity in relation to rail and the road network again encourages bypassing of the centre. The town sits on the edge of the Blaenavon World Heritage site and is historically important. This aspect could be better exploited.

We are aware of interesting emerging projects in the north of the country and have commented further on these below.

The pattern of imbalance between effort and impact is to be found throughout Wales.

- *How does the Welsh Government use the levers at its disposal to assist in the regeneration of town centres in Wales?*

The processes and approaches used are difficult to identify and are not usually clarified. The available levers should be used much more strategically and could be better co-ordinated so that active communities are supported with a light touch and swifter funding processes, where funding is attached to programmes. Too often

the planning function is viewed negatively and the opportunities it offers are unrealised. The clarity of national guidance in Planning Policy Wales compares favourably with some other UK countries. Local authority (LPA) guidance and policy could be better aligned, adopted, implemented and adhered to. Alignment of consents/procedures relating to the historic built environment, protected areas and listed buildings, would be beneficial. Much of this is being addressed already with several items at consultation stage and several recommendations from a variety of reports, already implemented. The issues around economics and opportunities for mixed use centres are affected by other ownership and investment forces which are highlighted below.

Lessons learned from the delivery of design quality and regeneration through Wales' only Urban Regeneration Company and its partnership working with the local authority would be very useful if analysed and shared with other local authority regeneration/economic development teams.

- *How are the interests and activities of communities, businesses, local authorities and Welsh Ministers identified and coordinated when developing and implementing town centre regeneration projects?*

This is often unclear.

In answering the questions above the Committee would be particularly interested in hearing views on the following issues:

- *The roles the Welsh Government and local authorities play in the regeneration of town centres.*

The role of local authorities is crucial and they require good skills, particularly in urban design, as well as properly set out, adopted and implemented local guidance, drawn from national policy. The coordination of design issues with an assessment of economic and community impacts needs to be carefully considered through a holistic approach, balanced through clear policy.

- *The extent to which businesses and communities are engaged with the public sector led town centre regeneration projects or initiatives, and vice versa.*

Public engagement with projects/initiatives can be problematic and is not always undertaken effectively or at the earliest opportunity, which can lead to adverse comment or disengagement from within communities. Some of the most vibrant town centres have achieved their level of vibrancy from an individual/community champion

rather than an initiative. Reference work in Ruthin, Cardigan, Narbeth already highlighted.

- *The factors affecting the mix of residential, commercial and retail premises found in town centres - for example, the impact of business rates policy; footfall patterns and issues surrounding the night-time and daytime economies within town centres.*
- *The impact of out-of-town retail sites on nearby town centres.*
- *The use of funding sources and innovative financial solutions to contribute to town centre regeneration – including the Regeneration Investment Fund for Wales; the use of Business Improvement Districts; structural funds; Welsh Government, local authority and private sector investment.*
- *The importance of sustainable and integrated transport in town centres—including traffic management, parking and access.*
- *The potential impact of marketing and image on the regeneration of town centres – such as tourism, signage, public art, street furniture, lighting and safety concerns.*
- *The extent to which town centre regeneration initiatives can seek to provide greater employment opportunities for local people.*
- *The Committee would also welcome any recommendations on what measures could be used to evaluate success of initiatives undertaken to regenerate town centres.*

Many of the issues above are covered in greater detail in our comments below.

Expanded comment:

Local authorities, the Welsh Government, various groups, individuals and organisations in Wales play an important part in Town Centre Renewal and Regeneration. There are some major areas which require greater sophistication of approach, if a more valuable, positive impact is to be achieved.

Design Quality

In Wales some of the most challenging areas are among the smallest rural spots and market towns. Cities constantly, aggressively pursue retail spend and it's much harder for Pontypool, Rhyl, Porthcawl or Ruthin. Nevertheless some are active and Ruthin has built on town and county local authority relationships and an active grass-roots community. Retailers, the arts and faith communities, schools, hoteliers and the wider public have

achieved much – from the re-design to RIBA award winning standard of the Ruthin Craft Centre, to a reputation for local food, good markets and great hotels. In 2010 The Guardian reported that Ruthin was a *“Gem of a town – an identity all of its own – with no Starbucks or McDonalds and nine places to have tea or coffee, the most prestigious being Annie’s which has 15 varieties of scone!”* The Bro Rhuthun partnership has worked with local businesses to build a website, produce jute bags, and launch a town loyalty card. They have also identified their architecture, historic and contemporary as key selling points and contributors to the environmental quality in the town and attractiveness to visitors, retailers and investors.

Key differentiators can be used as unique selling points and the Welsh language, local produce are differentiators. Good design is a key differentiator.

Successive reports over the last decade have demonstrated the economic value of good design, not least the 2007 report commissioned by Places Matter! The North West Regional Design Review Panel – part of England’s North West Regional Development Agency. These demonstrated that good architecture and urban design had real economic impact, showing that good design could add up to 20% in rental and capital value and speed up lettings and sales.

In 2009 the follow-up tested the findings in the context of economic downturn and the research held fast. In addition it revealed, as DCfW has consistently argued, that good design significantly mitigates the costly effects of poorly designed environments which are detrimental to social, environmental and economic success.

Good design draws multiple benefits, achieving better rents and market attractiveness due to enhanced profile and image. Design bolsters civic pride and supports access to goods, services and amenities; it stimulates local supply, delivers energy and carbon efficiency, reduces pollution and strengthens ecological benefits. Design forms part of a skilled employment sector and sets career paths for talented creative people, capable of delivering innovation.

Where good design and town benchmarking have been employed tangible benefits have been recorded. On these last, the work of Rhona Pringle of Accend and her previous work with Yorkshire Forward on market towns is impressive. Rhona has shared her knowledge with DCfW most recently in the work we have been doing in Ruthin. Action for Market Towns (AMT) have some very useful items on Town Benchmarking and the work of Catherine Hammant, chair of AMT is every interesting. Catherine also worked with DCfW on our small Ruthin seminar project ‘Designed for Business’ which we delivered in May 2011. The Commission will be pleased to share further information on this work with the committee.

Mixed use in town centres:

The refurbishing of existing townscape, street frontage and/or premises are affected by patterns of ownership, landlord/pension fund/investor interests – and the dynamic such patterns engender.

In cities and larger towns securing genuinely mixed use with a good residential element is more straightforward with larger owners/investors being less risk averse. Smaller operators in smaller towns – or no operators at all – present a great challenge.

Communication between parties is rare and/or fragmented; interests are often better served by allowing vacant property to sit empty rather than risk future investment opportunity; few owners/ landlords in Wales are experienced with meanwhile uses or temporary tenancy arrangements which could support co-worker and other SME initiatives.

Freeholders in a particular area could be brought together to agree new masterplans and prioritise which would offer a more fruitful collaboration than the promotion of a masterplan by an LPA or an external party.

Much regeneration is led by retail and in many cases by an 'anchor store'. Too often in Wales this is the sole focus and mixed use possibilities are not properly explored. This is partly a matter of finance, partly the culture of particular government departments, partly a lack of experience on such schemes (at local and national levels, both politically and amongst officers of LPAs), elsewhere and an absence of systematic analysis of possibilities, cost, opportunity and viability.

Business rates:

Models exist which demonstrate the value of sliding of flexible business rates which are more closely attuned with the nature of the business in question, its size and scale. Sliding scales in some areas assist smaller independent operators and retailers and we know of some areas of Wales where rate relief programmes have helped small centres, but these have been temporary measures.

The value of culture; engaging with artists:

Genuinely mixed development comprises cultural amenity alongside retail and other leisure. Wales could better exploit this aspect in smaller towns. Local authorities have in recent years taken a simplistic approach to art in the public realm and have failed to capture the value of projects which enrich the townscape and which add value for developers. Planning Policy Wales TAN 12 Design include very clear guidance on working with artists. A combination of good cultural provision, and a well animated streetscape

enlivened by good public art can significantly strengthen the attractiveness of town centres. Many artists and other creative practitioners populate smaller places with broader activities and co-worker set ups. These models are identified by organisations such as Urban Pollinators and Meanwhile Space and these models should be examined. Details of organisations and their web sites are below.

Retail and town centres; scale and appropriateness:

The Commission scrutinises many development projects through its Design Review Service and is at times presented with retail led schemes of inappropriate scale and unacceptable poor quality. In the long term these are damaging and they simply set up future problems.

The 'sequential approach': Planning Policy Wales Edition 4; Chapter 10, Planning for Retail and Town Centres points 10.1.1 through 10.3.18, P143-150

With regard to national planning guidance, PPW Edition 4 sets out very clear guidance at national level regarding balance and systematic analysis in relation to retail and town centres. In our experience it is referred to rarely. We would draw your attention to this aspect of PPW.

Town centres different functions and different places:

Liz Peace, of the British Property Federation has noted that *" Given the structural nature of these changes there is no point harking back to the old high streets we all claimed to love. We need to be creative in looking for new roles and uses for these empty shops."*

The 21st Century Agora report by Urban Pollinators also highlighted that town centres can be become much more socially centred places with a variety of different activity, less reliant on retail alone and with much more night time and flexible activity. The report also highlights collaborations in north Wales around Flint and we would direct you to the report via their website. We have included below their details and those of others working in innovative ways around this issue.

Initiatives and good practice:

Urban Pollinators Ltd <http://urbanpollinators.co.uk/>

Gavin Harris Manorhaus Hotel Ruthin, and Town Councillor
<http://www.manorhaus.com/>

Action for Market Towns <http://towns.org.uk/>

Empty Shops Network <http://emptyshopsnetwork.com>

Meanwhile Space CIC	http://www.meanwhitespace.com/
MyCard	http://towns.org.uk/amt-i/loyalty-cards-shop-local/
Incredible Edible Todmorden	http://www.incredible-edible-todmorden.co.uk/home
Research 00:/	http://www.architecture00.net/
Res Publica	http://www.respublica.org.uk/
Wigan Plus	http://wiganplus.com/
Cooltown Studios	www.cooltownstudios.com

About DCfW and the context in which it comments:

The Design Commission for Wales (DCfW Ltd) is a national organisation established in 2002 by the Welsh Assembly Government (now the Welsh Government), to champion better buildings, spaces and places. Design Commission for Wales Ltd (DCfW Ltd), is a wholly owned subsidiary of the Welsh Government.

The Commission champions high standards of architecture, landscape and urban design in Wales, promoting wider understanding of the importance of good quality in the built environment in the interests of sustainable development.

The Commission’s work responds to four strategic aims set out by the Welsh Government, in its funding agreement:

1. To champion *high standards of design* and architecture to the public and private sector in Wales by promoting wider understanding of design issues and the *importance of good standards in enhancing the built environment* across all sectors.
2. To promote design practice that is compatible with the Welsh Assembly Government’s Sustainable Development Scheme, *promoting best practice in energy efficiency, waste disposal and public transport.*
3. To promote design practice compatible with the highest standards in relation to *equal opportunity and promoting social inclusion.*
4. Give due regard to promoting *excellence in day to day developments*, like housing estates and industrial units, as well as promoting excellence in prestige projects.

The Design Commission for Wales is concerned with the quality of the built environment in Wales and to raise the design quality of buildings and the spaces between them, working with colleagues in the field of architecture, urban and landscape design and including consideration of the countryside as well as the cities, towns and villages of Wales. The skills and experience of its board, staff and voluntary panellists span commercial property, regeneration, architecture, sustainability, urban and landscape design, planning and transport.

Capacity and programmes:

The Design Commission for Wales comprises a small paid operational team of 4 staff (one part time), and carries additional capacity in the form of its expert volunteers acting as **Design Review Panellists** and also through its **Advocates in Practice Network**.

Design Review Panellists are practicing professionals in their field, experienced in all kinds of development projects. The panel is multi-disciplinary, with members coming from the fields of urban and landscape design, architecture, sustainability, planning, engineering and transport. They are appointed through competitive interview for a term of two years, pending review and reappointment. Panel members are unpaid and give their time and expertise freely. Advocates in Practice, like DCfW's Design Review Panellists, are unremunerated. Typically they will volunteer their time, energy and expertise in promoting DCfW's messages about good design and in playing a part in activities, events, research and campaigns.

DCfW's programme includes:

- National Design Review Service – scrutinizing public investment in and the quality of development schemes throughout Wales (For example in 2010 alone it scrutinised £1.8bn of development)
- Design Exchange for LPAs
- Bespoke professional training for LPAs
- Client support, mentoring
- Education: My Square Mile framework for Primary education
Know Your Place framework for Communities
- Case studies
- Conferences, seminars, other events, publications
- Advocacy, public and community awareness

DCfW sponsors The National Eisteddfod for Wales Gold Medal for Architecture. It is the only award supported by the Design Commission for Wales, which attaches great

importance to architecture as a vital element in the nation's culture and to honouring architects achieving outstanding design standards.

For further information go to www.dcfw.org

We hope our comment is helpful and would be pleased to provide further information should this be required.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Carole-Anne Davies', with a stylized flourish at the end.

Carole-Anne Davies
Chief Executive
cad@dcfw.org

Sent via email to Siân Phipps: enterprise&business.comm@wales.gov.uk