

## Lawrence Munyuki

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**From:** Tim Bridges  
**Sent:** 17 September 2022 15:38  
**To:** City Centre Development Planning  
**Cc:** Lawrence Munyuki  
**Subject:** Jewellery Quarter Neighbourhood Plan - Regulation 16 Consultation

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Thank you for consulting the Victorian Society on this Plan. My apologies that as I was on leave last week I have just missed your September 16<sup>th</sup> deadline. However, we would like to make the following comments.

The Jewellery Quarter Neighbourhood Plan is very concise. There are just four policies (although each has a number of sub-policies). They are:

1. Supporting and protecting the jewellery and creative industries.
2. The Jewellery Quarter as a creative mixed-use quarter.
3. Moving around.
4. Design in the Jewellery Quarter.

The Neighbourhood Plan boundary is very similar to the Conservation Area boundary, extending a bit further on the Great Hampton Street side. The Neighbourhood Plan policies are broadly setting similar criteria for development as does the Conservation Area management plan.

Our Victorian Society interest is likely to be mostly in policies 1, 2 and 4.

A new term which the Neighbourhood Plan introduces in Policy 1 is the *Creative District*. This is more or less similar to the Golden Triangle and Industrial Middle sub-areas in the Conservation Area.

Policy 1a. There is a presumption against residential development in the Creative District, similar to that in the Conservation Area Management Plan, but it is allowed "as an enabler to industrial development".

Policy 1d. The idea of a JQ incubator (space for small businesses) is supported. Presumably this could be a major development: see policy 2h).

Policy 2h is about major development providing space for creative industry. Policy 2f is about maintaining workspace for jewellery and creative industry.

Policy 4 mentions a document called *Design in the Jewellery Quarter*, which is said to be part of the Neighbourhood Plan. But although it is titled as Appendix 1, it does not appear in the Neighbourhood Plan. A separate Google search finds only an early draft.

Policy 4b Core Design Principles, states in section vi that . *Larger sites which historically (sic) would have been multiple properties should be developed as a series of individual buildings with a variety of heights, plans and roof forms to reflect the historic grain of the area.*

Issues:

The Victorian Society broadly support the policies of the Jewellery Quarter Neighbourhood Plan. They are based on similar principles to those in the Conservation Area Management Plan: the unique morphology of the Quarter: protection of environmental quality and historic fabric in particular: the defence and promotion of appropriate industrial uses.

Some reservations:

1. It is not clear what is the relationship between the Conservation Area and the Neighbourhood Plan. Do policies in the Neighbourhood Plan override those in the Conservation Area Management Plan? This needs clarification.

2. Much emphasis is upon the Creative District. This could have the unintended effect of reducing the application of appropriate policies to the rest of the Conservation Area.

3. The policies of a Neighbourhood Plan can be delivered only through the planning system. There is much reference in the Neighbourhood Plan to "creative industries". Yet there is nothing in the Use Classes Order about this subdivision of industry. There are only classes. E and B2. Does the Neighbourhood Plan have the power under the planning laws to restrict industrial uses in the Jewellery Quarter to those termed "creative"?

4. The list of relevant publications in the Neighbourhood Plan does not include the *Jewellery Quarter Design Guide*. Does the publication *Design in the Jewellery Quarter* replace this?

5. Residential development as an enabler of industrial development in the Creative District appears to be a dilution of the development policy in the Conservation Area Management Plan. The residential element has to be "proportionate to the extent of the benefit". This seems vague, and vulnerable to distortion.

6. Policy 4b vi (which is almost identical to 4b iv) looks like the encouragement of unacceptable pastiche. It is difficult to think of a large building which has been acceptably designed to resemble a number of smaller buildings. There are good large buildings in the Jewellery Quarter which can be taken as models: Lucas building, Newhall Works, Victoria Works, Argent Works.

I hope this is helpful, but if you wish to discuss further please do not hesitate to contact me.

Kind regards Tim Bridges

**Tim Bridges**

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