

<b>1</b>	<b>SUMMARY</b>
----------	----------------

**1.1 Background**

1.1.1 This is the evidence of The Institute of Historic Building Conservation (IHBC) to the Culture Media and Sport Committee Inquiry on *Protecting, Preserving and Making Accessible Our Nation's Heritage*, 2006. It has been prepared specifically for the Committee.

1.1.2 The IHBC would welcome the opportunity to appear before the Committee.

**1.2 Summary**

1.2.1 Historic places are those places that are valued by people for the way they embody our culture, both today and for the future.

1.2.2 The forthcoming Heritage White Paper must establish historic places as sustainable resources at the heart of our communities. The White Paper is expected to concentrate on reforms in the identification and management of our historic places, in line with proposals identified under Heritage Protection Review/Reform (HPR).

1.2.3 The IHBC enthusiastically welcomes the thinking underpinning proposed reforms and strategies, especially

- devolving more responsibilities for historic places to local people
- understanding that our historic places are part of a seamless whole, and
- recognising that the future of historic places must be supported by local government services that are secure, properly resourced and fit-for-purpose

1.2.4 The strategies expected in the Heritage White Paper provide a real opportunity to re-invigorate local community support for conservation through the planning process. At the same time they should secure significant overall savings when examined across the range of government priorities, including economic, environmental and social interests.

1.2.5 Yet the IHBC is extremely concerned that local authority services supporting our historic places are already under huge pressures. Without significant additional support they will not have the capacity to deliver under the proposals.

1.2.6 So the White Paper must underpin local management of historic places by securing both delivery and capacity at the heart of local government. Its priorities must be:

**Legislation: introducing obligations for local planning authorities to identify and care for their historic places, and provide specified core services for their conservation, and**

**Investment: providing new and dedicated investment, in the fashion of the Planning Delivery Grant, to support services and duties**

1.2.7 Legislation and resources must be balanced by performance measures that will ensure that delivery is effective and efficient, and in line with central government targets.

1.2.8 The IHBC's close involvement with the development the Heritage White Paper's proposals has encouraged us to produce recommendations that are no less challenging than those expected in the White Paper. Our proposals will help provide a coherent strategy for government to secure sustainable communities and conservation strategies for the 21<sup>st</sup> century.

<b>2</b>	<b>THE INSTITUTE OF HISTORIC BUILDING CONSERVATION (IHBC)</b>
----------	---

**2.1 The Institute of Historic Building Conservation (IHBC) is the UK's professional body for the conservation of historic buildings and places. Our multi-disciplinary membership is active across the public, private and voluntary sectors, and consists of professionals working as, conservation officers, planners, architects, regeneration professionals, project managers, historians, archaeologists, surveyors, engineers and urban designers, among others.**

2.1.1 The Institute of Historic Building Conservation (IHBC) supports professional activities in the sector by

- determining, defining and operating professional conservation standards
- shaping policy
- delivering educational, information and advisory services, for members & the wider public, and
- promoting professional development

2.1.2 The IHBC operates a range of services, including publications, both for its own membership and the public. Our website averages 25,000 hits per day, with visitors from many parts of the world. (See [www.ihbc.org.uk](http://www.ihbc.org.uk))

**2.2 The IHBC encourages participation in, access to, and awareness and understanding of historic places, both for their value to communities and as sustainable resources for our own and for future generations. Historic places help underpin our social, economic and cultural infrastructure, allowing society to address key priorities, especially those supporting the creation of sustainable communities. These can include:**

- diversity, including minority needs – historic places range from low-cost housing to integrated industrial complexes, and can provide the physical and economic variety capable of addressing the needs of many communities
- providing one of most sustainable resources – in contrast to demolition or replacement of historic places, their conservation secures low waste (e.g. carbon emissions and land-fill) and high-level construction skills
- promoting genuine social inclusion – they are especially useful in supporting deprived communities where, as an alternative to mass housing, they promote an infrastructure supporting communities with closer social links and more varied economic bases
- helping to make towns, cities and regions secure and more economically competitive by providing attractive and popular living places for key workers
- through heritage-led regeneration, shaping the cutting edge of modern practice in economic restructuring and diversification
- delivering education for all, as our historic places provide the most public manifestation of our cultural inheritance, including town & city centres, landscapes, parks, gardens, arts, interiors and design.
- representing and conveying key human needs and aspirations, from culture, citizenship and community to a sense of place
- embodying values and identities across Britain in all their diversity and plurality, helping create a national sense of pride and well-being
- contributing a unique, accessible and irreplaceable dimension to shaping the Quality of Life for all

2.2.1 The above principles are supported by a wide body of research, publications and surveys and studies, by a key sector stakeholders – including English Heritage, Heritage Lottery Fund, Architectural Heritage Fund, and Heritage Link among

others. (See section 5.1 below) They are summarised in our 'Valuing Places' Statement (Appendix 1)

**2.3 Conserving and maintaining our historic places for the benefit and enjoyment of people today, and for future generations, is regarded by the IHBC as a core duty of society.**

<b>3</b>	<b>WHAT THE DCMS SHOULD IDENTIFY AS PRIORITIES IN THE FORTHCOMING HERITAGE WHITE PAPER</b>
----------	--

- 3.1 The forthcoming Heritage White Paper is expected to focus on the implementation of the conclusions from the Heritage Protection Review through Heritage Protection Reform (HPR).**
- 3.1.1 The IHBC has welcomed its close involvement in examining how local communities in partnership with government services can best benefit from and support our historic places, and commends DCMS and English Heritage for their huge efforts to establish a substantial basis for reform.
- 3.2 Subject to proper legislation and resources, IHBC supports the principles behind HPR, including:**
- **Local Delivery** – delivering effective local management of historic places, which underpins new procedures for
  - **New Designation Systems & the Unified Register** – improving procedures & access to the process of designation
  - **New Consent Strategies** – making consent procedures simpler and more inclusive, and
  - **Heritage Partnership Agreements (HPAs)** – integrating management across certain classes of historic places
- 3.2.1 These new strategies are linked to an ongoing withdrawal of English Heritage from active participation at many levels of local conservation planning. To inform the implementation of the strategies, including the more recent discussions of phased introduction, studies commissioned by DCMS and English Heritage are currently being undertaken and are projected. (See DCMS & English Heritage, Local Delivery Research, unpublished drafts, 2006)
- 3.3 The Heritage White Paper is expected to propose that local government will deliver new conservation responsibilities and services, in accordance with the above ‘Local Delivery’ strategy, in large part through ‘stand-alone’ planning authorities. However effective ‘Local Delivery’ can only be achieved when conservation services, fit-for-purpose, are secured at the heart of local government.**
- 3.3.1 Local planning authorities require two things to effectively manage their historic places
- a properly skilled professional team able to provide expert input into planning decisions, including raising public awareness through outreach and education, and undertaking pro-active enhancement, and
  - adequate resources specifically supporting conservation and design services and, through fiscal and funding opportunities, providing market support where required.
- 3.3.2 It is generally recognised that the reform of heritage protection is unlikely to be successful unless both of these conditions are met.
- 3.4 We know that conservation services can, in economic terms alone, draw significant additional investment. For example in Lincolnshire, East Lindsey District Council Conservation Team delivered a very successful programme of conservation-led regeneration schemes attracting significant external funding. The team invested £450,000 of Council money to secure a total of £4.4 million of investment in the District, an impressive return on investment of almost 1:10. (See Appendix 2)**

- 3.5** However conservation services today are under serious threat across many parts of local government – including that in East Lindsey – where they survive at all. At present we understand that dedicated conservation services for Essex, Norwich, and Devon County are among those that have been dropped or are or are being phased out.
- 3.6** The huge pressures conservation services in local planning authorities face has been publicly registered most recently at the Annual General Meeting of Heritage Link on 7 December 2005. Here David Lammy, Minister for Culture, referred to inconsistencies in the provision of conservation services in different parts of the country.
- 3.6.1 Local authority conservation services usually fail to deliver because of inadequate resources or support mechanisms, or limited or absent expertise.
- 3.6.2 Research by English Heritage and the IHBC in 2003, *The Local Authority Conservation Provision Study*, (LACPS, 2003), describes a service surviving under severe pressure (see Section 9 below). This described conservation services at that time as follows:  
 ‘The overwhelming impression emerging from the survey is of a conservation service that is often stretched, under-resourced and operating without many of the necessary ‘building blocks’ that would ensure an effective, efficient and balanced service’.
- 3.6.3 Since then extensive local government reform has only led to the further deterioration of services, through:
- down-grading of conservation posts following the low grading of conservation skills and roles
  - diminishing resources compounded by lack of statutory duty and specific performance indicators
  - new duties & operations, including those attached to e-government & new planning obligations
  - limited corporate recognition of sector skills and training needs
  - reduction or cessation of conservation investment in historic places (including central government allocations)
- 3.6.4 These organisational problems aggravate related issues on the ground, encouraging
- a decrease in trainees and professionals coming into local government conservation service, creating an ageing profile (figures provided by IHBC for DCMS & English Heritage research into Local Delivery)
  - over-reliance on low-resource strategies, such as control, to compensate for the lack of pro-active strategies requiring investment
  - inconsistent regulatory standards, and, following from these
  - poor public perceptions arising from over-control in some areas and under-regulation in others
- 3.6.5 The IHBC understands the current state of conservation services across England will be captured in forthcoming research to be undertaken for DCMS & EH as part of their investigation of HPR strategies. This will allow for a more detailed understanding of the present situation.
- 3.7** As well as bringing opportunities for local decision-making, new proposals will involve English Heritage devolving its responsibilities and reducing its

**scrutiny of local conservation operations. Increased duty and reduced scrutiny of local planning authorities must be balanced by the introduction of clear duties and obligations for delivering conservation.**

- 3.7.1 Ongoing research has identified that local government structures and managers can be unclear about their duties to local historic places, in particular as regards perceived conflicts between preservation and enhancement. (DCMS & English Heritage 2006, Local Delivery Research, unpublished draft)
- 3.7.2 IHBC recognises that all local government services are subject to significant pressures. However conservation services are particularly threatened because of the long-term strategies they require and the diverse cross-sector returns they bring.
- 3.7.3 The IHBC notes that the recent proposal by English Heritage to phase the introduction of local delivery could help respond to some concerns over capacity, but only at the expense of effective implementation of Local Delivery. Certainly, without more clarity in the responsibilities of local government under HPR, conservations services will always be susceptible to disintegration.

### **3.8**

#### **KEY RECOMMENDATION 1**

**To secure local conservation services, the White Paper must introduce a legal obligation on local planning authorities to:**

- **care for their historic places, and to**
- **deliver defined services supporting their historic places, including Buildings at Risk registers, technical advisory services, grant aid and current and relevant information in the form of Historic Environment Records**

- 3.9 **Any devolution of duties to local government, or increase of responsibilities, must be accompanied by dedicated investment in local authority services in the fashion of the Planning Delivery Grants (PDG).**

- 3.9.1 We do know that new duties expected in the White Paper will bring new budgetary pressures, even if the precise impacts are, at this time, unclear. For example, moving consents for scheduled ancient monuments to local authority control will require additional skills to be employed or bought in to many services. Also, while we understand that there is no detailed analysis of the financial impact of Heritage Partnership Agreements (HPAs), they may have considerable resource implications for many services. English Heritage has piloted a limited number of such agreements but it has not to our knowledge calculated the cost to the local authorities in terms of staffing and time required to bring management agreements into effect. Proposals for Local Lists, while still undergoing development, also will place new burdens and additional duties on local services.
- 3.9.2 Any additional duties for planning authorities not attached to additional resources will result in current essential work being sidelined.

### **3.10**

#### **KEY RECOMMENDATION 2**

**The White Paper must secure an investment programme, in the fashion of the Planning Delivery Grant, to :**

- **bring all local conservation services to an operational standard in anticipation of the changes, and**
- **cover the impact of Heritage White Paper proposals on internal budgets**

- 3.11 To ease pressures on local conservation services under any White Paper proposals, ODPM must take a lead in delivering support for the services, their resources and their budgets, either directly through White Paper-related reforms, or indirectly through other initiatives. These would be expected to include delivering:
- Regulation of demolition through planning controls
  - Performance indicators for local authorities
  - 'Flat'-VAT on repairs
  - Conservation Area controls
  - Interim revision of select parts of PPG 15, and
  - New development guidance
- 3.12 **Demolition:** Demolition is not regarded as development, so communities often look to conservation controls to protect threatened buildings, regardless of their historic value. This places a burden on the sector as a whole, and undermines conservation principles. As un-managed demolition itself is environmentally unsustainable, demolition should be controlled within the wider planning system. This would then ease the burden on conservation services under the new proposals.
- 3.13 **Performance indicators:** Corporate support for conservation services within local government could be enhanced or secured by using relevant performance indicators. Such indicators shape wider management processes and, provided they are fit-for-purpose, can help manage resources within local authority priorities. Assessing over time the numbers of historic Buildings At Risk, for example, would help focus attention on their rescue.
- 3.14 **VAT on repairs:** As VAT is charged on repair or refurbishment, but not on new-build, there is a key financial incentive to replace old and historic fabric with new, rather than repair it. The ODPM Committee report on *The Role of Historic Buildings in Urban Regeneration* (2004) recommended that that 'The tax system needs to favour the preservation and reuse of historic buildings rather than deter it. The imposition of VAT on the repair of historic buildings whilst newbuild projects are exempt deters developers from taking on complex projects involving historic buildings and runs counter to the Government's sustainability agenda and its policy on promoting the reuse of historic buildings'. (Recommendation 23).
- 3.14.1 The IHBC notes the government's response (November 2004), and urges the ODPM to identify a route that will resolve the discrepancy, rather than present a reason why it should not. There is an ongoing review of the impact of reduced VAT rates that includes as an objective the 'modernisation' of the system in the context of labour-intensive activities. As part of this, there was an experimental reduction of VAT on repairs and renovations to private dwelling in The Isle of Man. Unfortunately it was assessed only in basic fiscal terms, of employment and prices, and not the wider environmental benefits such reductions could bring. (See [http://europa.eu.int/smartapi/cgi/sga\\_doc?smartapi!celexplus!prod!DocNumb&lg=en&type\\_doc=COMfinal&an\\_doc=2003&nu\\_doc=309](http://europa.eu.int/smartapi/cgi/sga_doc?smartapi!celexplus!prod!DocNumb&lg=en&type_doc=COMfinal&an_doc=2003&nu_doc=309)) As of 2003, construction industry activities involving repairs, maintenance and improvement – 'RMI' – constituted 50% of the entire business of the construction sector, effectively contributing to 4% of GDP (see *Altogether stronger, Skills Needs Analysis for construction* (Sector Skills Council for Construction, 2004/5). The IHBC believes that, not least given the scale of the activities, any study of the modernisation of

VAT should include a test of the impact on cultural and environmental resources of reduced VAT on repairs.

**3.15     Conservation Areas: Conservation Areas are increasingly seen as effective tools for delivering economic development and regeneration, but they are also complex and inconsistent in their scope, convoluted in process and limited in impact. They need to be simplified and clarified. To bring development in conservation areas under more effective control, the Institute believes that in this specific instance more regulation would equate to better regulation in terms of comprehension and ease of administration.**

3.15.1 Without supplementary controls (referred to as ‘Article 4s’) conservation areas do not provide the protection and quality assurance that people expect of them. Conservation Areas should become a designation with simple, robust and consistent control of demolition and damaging change, and require the retention of key cultural features such as doors and windows, roofing and walling materials, chimneys, *etc.*

**3.16     PPG 15 update: The re-writing of a consolidated policy statement for historic places must await new legislation. However there is still an urgent need for interim revisions and up-dates of parts of PPG 15.**

**3.17     New development guidance: The IHBC is concerned over the low quality of much new development, including that in and around conservation areas, or involving extensions or adaptations to listed buildings. New development in historic places does not need to imitate the original, it should be a creative response to it. Legislation and guidance for new development in historic places, and resources to ensure best practice, should encourage quality.**

3.17.1 The IHBC welcomes the strength of recent guidance for planning authorities on design. This advises that: ‘Design which fails to take the opportunities available for improving the character and quality of an area should not be accepted’. (PPS1) This is now more rigorous than the special requirements for listed buildings and conservation areas. New guidance for historic places should ensure that:

- Conservation designations promote creative solutions, not suppress them. Guidance should deal with situations where new development seeks to complement general *townscape* characteristics (not stylistic characteristics) and those where bolder statements are appropriate
- Guidance should also deal with the relationship between planning and the procurement and construction of development. At present, many local planning authorities and designers leave important design decisions to building contractors, when careful conditioning of planning consents can be used to assure better design quality
- Better design training for decision makers in both urban design and architectural principles is essential. This should lead to better understanding of the difference between quality assurance, and subjective stylistic preferences
- There should be a greater emphasis on analysis and understanding of urban context in new design. Conservation Area appraisals, area or building management plans, and urban design frameworks are examples of good practice.

**3.18**

**KEY RECOMMENDATION 3**

**ODPM must lead in delivering reforms to support proposals in the Heritage White Paper, including:**

- **controlling demolition through the planning system**



- pursuing a clear strategy for equitable VAT on repairs, to include promoting in Europe an examination of the cultural and environmental impacts of reduced VAT on repairs given their labour-intensive nature
- promoting management mechanisms, such as performance indicators, to support delivery of local conservation services, such as Buildings at Risk services
- tightening Conservation Area control and making it more consistent
- completing an interim revision of agreed parts of PPG 15
- demanding quality new design in historic places either through tightening current planning legislation or through supporting guidance

**3.19** As the responsibility for implementing new heritage legislation will fall primarily to local authorities, the IHBC is concerned that the steering group overseeing the HPR programme appears to have no representatives from the local government sector. This could undermine the value and delivery of White Paper proposals.

**3.20**

**KEY RECOMMENDATION 4**

Local Government representation should be given priority in the further development of the Heritage White Paper

<b>4</b>	<b>THE REMIT AND EFFECTIVENESS OF DCMS, ENGLISH HERITAGE AND OTHER RELEVANT ORGANISATIONS IN REPRESENTING HERITAGE INTERESTS INSIDE AND OUTSIDE GOVERNMENT</b>
----------	--

**4.1**      **Joined-up government is essential to deliver the cross-cutting benefits of historic places, and this is not evident. Historic places, and their roles in creating sustainable communities, are side-lined or overlooked in favour of more narrow departmental agendas. Despite their best efforts DCMS, which is responsible for historic places in central government, has not been able to achieve cross-government support, for example:**

4.1.1      As noted above, reduced VAT on repairs would help promote the more environmentally and economically sound principal of maintenance over replacement. Key development and economic interests in government have failed to pursue this strategy pro-actively, despite consolidated calls across the sector.

4.1.2      Similarly, the sequence of challenges faced by English Heritage in recent years, including review, re-structuring, re-organisation and, now, re-location, have been met only by an overall reduction in investment from central government (See section 7.1 below).

4.1.3      The remarkable returns the HLF has brought through its cross-cutting investment in the social benefits of conservation have been fully and effectively documented in their publications (See <http://www.hlf.org.uk/English/PublicationsAndInfo/AccessingPublications/OtherPublications.htm>). Yet now its fund is threatened by a multiple-whammy of re-distribution of reserves, reduced income from lottery sales, and threatened reductions due to the forthcoming 2012 Olympics.

4.1.4      Again, the extra capacity and coordination Heritage Link brings to the sector is achieved in the face of minimal investment by central government, despite the huge added value it brings in voluntary contributions from member organisations. Similar problems are faced by the national amenity societies, despite their capacity to promote informed engagement in development issues.

4.1.5      The IHBC's long-standing advocacy of the importance of local government services delivering support for historic places – an agenda supported by many partners across the sector – has been met only by the deterioration of services referred to in section 3 above.

4.1.6      The positive initiatives of DEFRA's invaluable involvement in the improvement of historic places through agri-environment schemes is extremely welcome, but represents an exceptional situation, spurred on by European funding, rather than the ordinary practice it should.

**4.2**      **As the management and guidance of change takes place through the planning process, the lead department for planning, currently ODPM, should also be the lead department for the protection of the historic environment.**

**4.3**

<b>KEY RECOMMENDATION 5</b>
-----------------------------

<b>Government reform at Cabinet level is required to deliver joined-up support for historic places at the most strategic level, including re-locating DCMS interests in historic places inside the planning portfolio currently held by ODPM.</b>
---

**4.4 It is essential that government takes full advantage of the ways it can directly support historic places.**

- 4.4.1 In particular Regional Development Agencies (RDAs) have a key role in determining regeneration strategies and priorities for different areas. Yet unless there is a strong qualitative basis to their activities, regeneration is unlikely capitalise on community and cultural resources and to be sustainable. IHBC would like to see a greater emphasis on the quality of regeneration, especially through recognition of the capacity for heritage-led regeneration, supported by quality design, to deliver higher value and more sustainable benefits. Greater public involvement, including meaningful community participation, would help incorporate in the development of RDA priorities genuine local interest in historic places.
- 4.4.2 The Commission for Architecture and the Built Environment (CABE) helps to provide guidance on best practice in new architectural and urban design. Closer and more integrated working between CABE and English Heritage, supported through ODPM, would enable a more effective holistic approach to the quality of the built environment, old and new.
- 4.4.3 Government must support inter-departmental communication by promoting participation by heritage bodies with cross-sector interests, such as IHBC and Heritage Link.

**4.4**

**KEY RECOMMENDATION 6**

**Government must deliver its support for historic places through all its activities and partners, including:**

- **ensuring that every RDA employ special advisers with skills in conservation and design, and responsibility for quality assurance**
- **encouraging links between English Heritage and CABE**
- **actively promoting participation by heritage organisations with cross-sector agendas, such as IHBC and Heritage Link, in the development of inter-departmental agendas**

**4.5 Faced by a wider agenda and diminished resources, lack of government support for English Heritage has undermined its capacity to deliver. For the future it must be encouraged to focus on two key priorities, casework support – both for today and under any HPR strategies – and investment in historic places through grants. IHBC is especially concerned that English Heritage caseworkers are overstretched at present and that funding for partnerships in conservation areas grant schemes is being squeezed. Property management and visitor site functions should not distract from the need for effective partnership with local government.**

- 4.5.1 English Heritage must continue to develop its focus on the ways area grant schemes and other heritage initiatives contribute to sustainability and social inclusion, and actively pursue closer working with regional development agencies, English Partnerships and other investment, funding and regeneration agencies.

**KEY RECOMMENDATION 7**

**English Heritage should give priority to:**

- **working in partnership with local authorities to support local conservation delivery, and working with regional development agencies and other agencies to promote awareness of the importance heritage plays in regeneration and the creation of sustainable communities**
- **securing, delivering and promoting investment in conservation area-based schemes**
- **developing its casework function to ensure that proper support is given to local authorities when dealing with planning proposals and regeneration projects, both for today and in line with any HPR proposals**

<b>5</b>	<b>THE BALANCE BETWEEN HERITAGE AND DEVELOPMENT NEEDS IN PLANNING POLICY. (THE ROLE OF HERITAGE IN DELIVERING SUSTAINABLE DEVELOPMENT)</b>
----------	--

**5.1 There is no necessary conflict between heritage and development interests. Already progressive development practices are seeing historic places as positive catalysts for regeneration, diversity and economic growth, and for promoting quality new design.**

5.1.1 In fact the role of heritage in the delivery of wider economic benefits, including especially heritage-led regeneration, is well established in a range of reports. Some of the main ones are:

- *Regeneration and the Historic Environment*, English Heritage, 2005
- *New Life – Heritage and Regeneration*, The Heritage Lottery Fund, 2004
- *The Role of Historic Buildings in Urban Regeneration*, ODPM Housing, Planning, Local Government and the Regions Committee, 2004
- *The Heritage Dynamo*, Heritage Link, 2004
- *Heritage Counts*, English Heritage, 2003
- *Heritage Dividend*, English Heritage, 2003
- *The Economic Power of Restoration*, D Rypkema, 2001 (See [http://www.ihbc.org.uk/1main\\_pages/opportunities.html](http://www.ihbc.org.uk/1main_pages/opportunities.html))

5.1.2 Schemes based on the conversion and reuse of historic buildings and areas are amongst the most sustainable forms of development and are crucial tools in the delivery of sustainable communities. As identified in the publications cited in 5.1.1, there are numerous dimensions to this:

- Energy and landfill – Demolition of existing building stock contributes to landfill and involves the loss of the embodied energy used in the manufacture of materials and construction. Further energy is then invested in the replacement development, usually at the expense of high carbon emissions. This can be avoided by working to retain and convert historic or other existing building stock rather than replace it
- Historic buildings and areas better support mixed use and mixed communities due to the wider range of types of floorspace and rental levels
- This factor also allows community uses to be more easily accommodated. It also provides for minority needs and demands and promotes social inclusion. For example, older areas can provide a focus for specialist retail such as charity shops, affordable IT, alternative music and youth culture, and ethnic foods and fashions
- The variation in rental levels is also crucial to accommodate small businesses, creative and high tech industries and fostering innovation. Historic buildings can provide for economic diversification and increased job opportunities
- Historic places are also important for cultural development, both by catering for minority tastes and also often having a past associated with local industries and specialisms. Historic buildings often form a focus for the arts and craft based skills
- Older housing areas are often high density in nature and for many people are a preferred choice to 'soulless' off-the-peg new housing
- Historic buildings have also helped to increase diversity of housing stock, including the repopulation of inner city areas. Often such schemes incorporate a range of tenures including affordable housing and starter homes
- Historic areas often incorporate good urban design principles, such as legibility and good pedestrian permeability. Historic buildings and spaces are often adaptable to changing demands. Pedestrian interests can be a strong feature of historic places

5.1.3 In addition heritage-led regeneration has been a key element in the transformation of inner cities all around the UK in the past decade, prominent examples including Grainger Town and the Baltic Flour Mill in Newcastle, Ropewalks in Liverpool, the

canal corridors and City Centre in Manchester, the Jewellery Quarter in Birmingham and the Lace Market area of Nottingham.

- 5.2 At the same time, environmental and economic interests have become more closely integrated, not least in response to issues such as Global Warming and bio-diversity. As carbon trading is increasingly factored into key economic decisions, conservation is, compared to new development, a low-carbon emission strategy by definition. The cross-sector BEFS response to the DEFRA consultation on sustainability, *Taking it on*, noted that ‘historic fabric is intrinsically ‘sustainable’’. (See <http://www.befs.org.uk/TakingItOnResponse.pdf>)**
- 5.2.1 Conservation strategies help to manage development in a more sustainable way, and are associated with reduced waste & landfill, recycling, lower carbon emissions, more advanced skills, tourism, and more attractive working and living environments, all of which have clear economic impacts. (See 2.4 above and 6 below).
- 5.3 Similarly the sustainable conservation of historic places requires specialised skills and competences capable of informed professional operations, such as those required for IHBC membership. The sector’s recognition of the principle of inter-disciplinary skills is represented by key publications, including the Egan Report (<http://www.dti.gov.uk/construction/rethink/report/>), the ODPM’s *Evidence base review of skills for sustainable communities* (2004), the cross-cutting interests of the Academy for Sustainable Communities (ASC; web site <http://www.ascskills.org.uk/home/index.cfm>), and the Construction sector’s analysis of needs in skills, *Altogether stronger, Skills Needs Analysis for construction* (see above). This last has noted that ‘There is a lack of understanding of the impact of the Government’s wide-ranging sustainability agenda on what and how the industry builds’. Clearly the sector as a whole fails to understand the contribution conservation can make to the sustainability agenda.**
- 5.3.1 To deliver support for historic places effectively and efficiently, it must be shaped by skilled conservation professionals who are fully informed of its priorities and principles. Membership of relevant professional institutes, including the IHBC, helps confirm standards, not least as most institutes usually require ongoing professional development programmes. Increasingly informed developers are looking to employ this type of expertise. Planning authorities and English Heritage can play an important role here by insisting on appropriate professional qualifications.
- 5.3.2 English Heritage initiatives to enhance the skills of professionals operating in conservation and related disciplines are particularly welcome, and have the full support of relevant professional bodies such as the IHBC.
- 5.4 However, at the local planning level, conservation benefits are generally not valued for their contribution to wider sustainability-related targets, and so the opportunity to promote sustainable development at the local level is compromised, even under-mined. In the absence of a suitable indicator, it is impossible to include these conservation-related benefits in wider sustainable strategies.**

## 5.5

### **KEY RECOMMENDATION 8**

**Establish a new sustainability indicator covering conservation and historic places so they can be managed within wider planning strategies, including Local Development Frameworks.**

<b>6</b>	<b>ACCESS TO HERITAGE AND THE POSITION OF HERITAGE AS A CULTURAL ASSET IN THE COMMUNITY</b>
----------	---

**6.1 The IHBC encourages physical and intellectual access to the built heritage for all people.**

6.1.1 Projects that are partially or completely funded from public sources provide opportunities to require and develop such access. IHBC members are involved in sensitively adapting buildings to provide access for people of limited mobility, all in accordance with statutory and best-practice requirements.

**6.2 Heritage has a fundamental role in defining national, regional and local cultural identity (See section 2 above).**

6.2.1 Industrial heritage in places like Birmingham, Nottingham, Liverpool and the Potteries provide locally distinctive townscapes, sometimes still accommodating the original manufacturing activities, but also often accommodating new businesses, creative industries and other activities.

6.2.2 The Ropewalks area of Liverpool became a focus for creative industries. Places like Birmingham's Jewellery Quarter or Nottingham's Lace Market have adapted and contribute to modernisation and diversification. Market towns, canals, historic city and town centres, traditional housing areas, post-war planned development, villages, parks, gardens, cultural landscapes, and a range of other historic places all contribute to creating balanced, sustainable and well functioning places.

**6.3 Historic areas are often better at catering for the needs of local communities and minority groups. The diverse needs of small communities will often correspond more closely to those uses that historic places originally addressed, including the provision of flexible living and working spaces. (See section 5.1.2 above)**

6.3.1 Shops and businesses catering for specialist markets are rarely to be found in areas that have been comprehensively redeveloped, but are often found in older buildings and areas which offer more viable rental levels.

**6.4 The destruction of historic areas has often resulted in the loss of community facilities, break-up and fragmentation of communities, narrowing of economic and employment choices and opportunities, and loss of distinctive local identity.**

6.4.1 While more rare than in previous decades, such mistakes are still being made. The public outcry against recent plans to demolish large areas of terraced housing in Housing Pathfinder areas illustrates this. This is not to say that the worst housing shouldn't be demolished, but it is crucial to look beyond crude supply and demand economic factors and consider the more complex human interactions of communities, as well as the environmental impacts, such as waste generation and carbon emissions. (See section 5 above)

**6.5 Conservation strategies shaped through HLF and EH funding increasingly remind us that the profile of people who live, work and spend leisure time in historic buildings and places is extremely diverse.**

6.5.1 Indeed many under-privileged, minority and 'hard to reach' groups are key stakeholders in managing heritage assets, and only need access to the resources to



become caring and constructive. Innovative and creative approaches are required support and empower local communities and minority groups. These include area grant schemes, individual projects and educational initiatives aimed at both schools and communities, such as those being undertaken in various regions by Planning Aid England.

**6.6 Local historic environments also have an educational role, helping people to understand how their area developed and grew. Such understanding is often crucial to managing and planning the future of an area in partnership, informed by the wishes of the community.**

6.6.1 Local schools' 'Citizenship projects' on the history and potential of their own surroundings involve the wider community, as children take the ideas home to their parents. Cutbacks in English Heritage mean that despite excellent generic publications the organisation has had to concentrate on its own sites or immediate policies, rather than a wider agenda, and this is a missed opportunity. Partnership with the DfES could secure funding to provide schools with local resource material for such projects.

6.6.2 As is well known, historic places can also form the basis of tourism and the visitor economy is increasingly significant in many areas.

**6.7 The contributions of the HLF – and its strategy for allocating funding within access-related priorities – have significantly enhanced access to the heritage while also promoting its conservation. However recent reductions in funding for heritage projects reduces the scope for such activities. This will leave more of our historic places inaccessible to many members of the public. Also, by failing to implement conservation strategies today, it will also compromise access by future generations.**

**6.8 Historic places represent the cultural legacy of different places and communities, but also help them to adapt and provide for ongoing cultural development. The destruction or neglect of historic buildings and areas destroys cultural diversity and increases social exclusion. A properly resourced heritage sector is a crucial part of an inclusive and diverse society.**

**6.9**

**KEY RECOMMENDATION 9**

**In order to secure access, understanding and enjoyment of our historic places for all communities, for today and for future generations, proposals expected in the forthcoming Heritage White Paper must be properly resourced and implemented.**

<b>7</b>	<b>FUNDING, WITH PARTICULAR REFERENCE TO THE ADEQUACY OF THE BUDGET FOR ENGLISH HERITAGE AND FOR MUSEUMS AND GALLERIES, THE IMPACT OF THE LONDON 2012 OLYMPICS ON LOTTERY FUNDING FOR HERITAGE PROJECTS, AND FORTHCOMING DECISIONS ON THE SHARING OF FUNDS FROM LOTTERY SOURCES BETWEEN GOOD CAUSES</b>
----------	---

**7.1** Government investment in historic places has diminished rapidly in recent years. The IHBC is appalled by the relative decline in funding for English Heritage at a time when DCMS commitment to the arts and sport has seen large increases. English Heritage has, by its own figures, been subject to a £9.7m reduction in funding over the past 5 years. This marks a stark contrast with other players in the culture sector (See DCMS Annual Reports). HLF's rightly celebrated contributions to the sector – with £3 billion invested in the heritage since 1995 – have been a key safety line for the sector. However these are masking huge reductions in core government funding

**7.2** Notwithstanding the poverty of government investment, English Heritage, the HLF and other investment bodies and charities, have achieved exceptional value for their investments by securing sustainable futures for many of the nation's historic places, in some of the most challenging fiscal and social circumstances. (See for example *Annual Reports* of English Heritage, Heritage Lottery Fund, Architectural Heritage Fund)

**7.3** The current low priority for heritage and freeze on investment in historic places will not support sustainable development as it actually ignores the wide social, cultural and environmental returns these places bring. (see section 2 above) The consequences are:

- English Heritage has reduced casework support for local authorities and building owners, without compensatory increase in local authority capacity. This can only bring about a drop in the quality and substance of decisions
- Funding for area grant schemes is being lost. Such schemes have a significant role to play in delivering regeneration and social inclusion
- The potential of the built heritage is not being realised in terms of accessibility, education, economic development, and delivery of a range of beneficial new uses, a problem aggravated by the difficulty of measuring this failure
- Buildings at risk problems of under use, poor condition, dereliction and environmental degradation cannot be adequately addressed, which will give rise to an increase in demolitions
- The regeneration of inner city areas, industrial areas, towns and villages, and rural areas can be compromised, especially in areas of significant market failure
- Skills in the sector are not being adequately maintained or developed
- Lack of certainty over future funding is undermining pro-active project development activities
- There is a huge loss of other public and private sector funding that could be levered by heritage funding

**7.4**

<b>KEY RECOMMENDATION 10</b>
------------------------------

Given central government failure to maintain overall budgets for bodies investing in historic places, there should be a formal commitment to redress recent funding imbalances in the sector, in particular for English Heritage.
---

**7.5** Pressures on budgets of heritage bodies, especially the HLF, from the 2012 Olympics, ignore the wide-ranging social contribution achieved through

**strategic investment in historic places. The Olympics is a remarkable national opportunity to show the international community our best-practice in regeneration, including heritage-led regeneration. Indeed area regeneration was the centrepiece of the successful bid. Heritage bodies have key roles to play for 2012, and, not least to avoid the international criticisms faced in previous Olympics-related development programmes, they should have access to additional dedicated funding.**

- 7.5.1 However as the regeneration for 2012 will be necessarily largely localised, any investment there should not result in an overall reduction in regional investment in heritage programmes.

**7.6**

**KEY RECOMMENDATION 11**

**Additional budgets should be made available to key funding bodies such as English Heritage and HLF for 2012, as investment in heritage programmes, especially area grants, is the key to securing sustainable development for many parts of the Olympics' regeneration programme.**

- 7.7 **The Heritage Lottery Fund provides funding for individual building projects and for historic areas through the Townscape Heritage Initiative (THI) programme, while also supporting diversity in and access to the sector through educational, policy, research and related strategies.**

- 7.7.1 The HLF has built a highly effective policy and public relations resource supporting heritage interests across the sector directly out of its investment strategy. The integration of its funding strategy and its policy development has been an important development in the representation of the heritage interests at all levels of government.

- 7.7.2 The HLF area programmes are particularly effective in under-pinning this strategy. THI's have helped to deliver dramatic transformations of town centres, traditional industrial cores, and other failing or under-performing areas.

**7.8**

**KEY RECOMMENDATION 12**

**The individual grant-based investments and Townscape Heritage Initiative programme of HLF should be consolidated and expanded. Care is required to ensure that resources are not drained from the programme by the Olympics or from the transfer of funds to other lottery operators.**

- 7.9 **At least two separate area grant schemes for historic places, as currently operated through English Heritage and the Heritage Lottery Fund, must be maintained, to provide match funding under Treasury guidelines.**

- 7.9.1 It is essential that both English Heritage's area partnership schemes and the Heritage Lottery Fund's Townscape Heritage Initiatives continue to operate independently. They have differing criteria and are used in different circumstances. It is especially crucial that at least two independent heritage-specific funding bodies exist, for match-funding purposes as it is not always possible to obtain match funding from mainstream regeneration sources.

7.10

**KEY RECOMMENDATION 13**

**Individual grant investments and Townscape Heritage Initiative programmes should be maintained and expanded, with a particular focus on the need for the retention of two separate funding streams, as is currently available from English Heritage and HLF.**

**7.11 There is a lack of understanding and application of principles of investment and return in the sector. There is an urgent need for fiscal perspectives on:**

- Heritage Protection Reform proposals, including a full cost-benefit analysis of its impacts across government services and priorities
- the role of the historic environment in delivering social, economic and sustainability objectives, including the Government's Sustainable Communities policy
- the benefits of expanding skills in the sector, including craft-based, technical and professional skills
- the advantages of promoting pro-active strategies such as project-based investment, rather than just reactive control work
- the benefits arising from better integration with other Government departments, including the education, planning and regeneration ministries
- environmental returns, and associated budgetary gains, from conservation

**7.12 The IHBC, based on its knowledge of the state of our historic places, suggest the following priorities for investment:**

- better investment local government specialist design and conservation services
- an expanded English Heritage casework and funding capacity
- expansion of area grant schemes, especially in areas of market failure
- grants for buildings at risk
- development of sector skills, across the public, private and voluntary sectors. These should include practical building skills, design and conservation training, and generic skills such as project management
- improved access to heritage
- education and capacity building initiatives aimed at both local communities and the visitor economy

7.13

**KEY RECOMMENDATION 14**

**The IHBC urges a comprehensive reassessment of investment in our historic places, including grant and funding programmes, to gain a better understanding of the returns this can bring, with a view to redressing reduced allocations to the sector over recent years.**

<b>8</b>	<b>WHAT THE ROLES AND RESPONSIBILITIES SHOULD BE FOR ENGLISH HERITAGE, THE HERITAGE LOTTERY FUND, LOCAL AUTHORITIES, MUSEUMS AND GALLERIES, CHARITABLE AND OTHER NON-GOVERNMENTAL ORGANISATIONS IN MAINTAINING THE NATION'S HERITAGE</b>
----------	--

**8.1** The IHBC commends the wide spectrum of active players in our sector as a sign of its vigour, inclusiveness, diversity and accessibility. However we do also recognise that this breadth of interest can limit clarity in policy and strategy, both inside and outside the sector. In response, the IHBC is committed to promoting stronger partnership between the sector's stakeholders, including developing inclusion and diversity agendas.

**8.2** As a multi-disciplinary organisation, IHBC especially welcomes co-ordinating bodies such as Heritage Link and The Joint Committee of National Amenity Societies, in particular for the extra capacity they bring to the sector. Such consolidation, whether of policy or resources, does not undermine the inclusion and diversity inherent in the sector.

**8.2.1** The roles and responsibilities of English Heritage, HLF and local authorities are considered in sections 3 and 4 above, and in section 9 below.

**8.3** Each of the bodies referred to in this section's title plays a variety of roles in the sector, again representing its capacity to deliver. Any formal classification necessarily under-estimates their contribution. However key activities may include any of the following, all of which are crucial to delivering futures for our historic places:

- **Funding** – providing and directing investment in historic places, typically through grants and funding, ranging from strategic investment provided by English Heritage and HLF, through the activities of the Architectural Heritage Fund, to small charities supporting individual building preservation programmes
- **Preservation & Regeneration** – often project-based organisations, such as building preservation trusts (BPTs) generally constituted as charities, that develop, manage and operate conservation programmes invariably benefiting from high voluntary and community inputs
- **Advice** – again ranging from national bodies such as English Heritage to the informed specialised activities of national amenity societies or institutes such as the IHBC, to local amenity interests represented by civic trusts
- **Advocacy** – issues-based support for historic places, operating at strategic levels (such as through policy development by professional institutes like IHBC) as well as specific project-oriented advocacy in the informed casework of the national amenity societies
- **Stewardship** – providing strategies for caring for specific parts of the nation's historic places, either direct, through ownership & maintenance, or indirect, through supporting the informed guardianship that the planning system can provide
- **Education** – promoting understanding and awareness, an activity to which all organisations will contribute
- **Community support & inclusion** – Adding capacity to the community, through promoting voluntary activities, engagement with and mediation in public interests, and promoting access, diversity and inclusion
- **Professional support** – professional institutes, such as the IHBC, that provide quality assurance through promoting and regulating professional activities

- 8.4** Types of bodies may be best classified according to scale, focus and remit:
- Large-scale dedicated national heritage bodies such as English Heritage and HLF bring a wide-ranging experience and understanding of the nation's heritage in all its manifestations – from technical conservation of objects to policies for places – that is particularly valuable to the wider sector
  - Smaller scale national heritage bodies such as the national amenity societies play key roles in building capacity in the community and informing planning strategies through informed advocacy
  - Professional institutes – Promote and support professional activities, while also encouraging voluntary activities and development within the profession
  - Link organisations, such as Heritage Link and the Joint Committee of National Amenity Societies, that help build capacity, communications and partnership
  - Voluntary organisations (including amenity bodies) – play a central role in delivering support for and information on the sector through community interests. They are invariably among the most fully informed players within their own remit, and add huge value to the sector through their voluntary activities
  - Others – the many other bodies that play roles outlined in section 8.3 above, with varying degrees of responsibility, interest and success, including national advisory bodies such as CABE, professional institutes such as RIBA and RTPI and many others.
- 8.5** The forthcoming Heritage White Paper heralds significant change in the sector, particularly for core conservation service providers, such as English Heritage and local planning authorities. The IHBC considers that, beyond dedicated investment, there should be no major changes in roles and responsibilities for bodies in the wider sector until there is a better understanding of the impact any changes will bring.

<b>9</b>	<b>WHETHER THERE IS AN ADEQUATE SUPPLY OF PROFESSIONALS WITH CONSERVATION SKILLS; THE PRIORITY PLACED BY PLANNING AUTHORITIES ON CONSERVATION; AND MEANS OF MAKING CONSERVATION EXPERTISE MORE ACCESSIBLE TO PLANNING OFFICERS, COUNCILLORS AND THE GENERAL PUBLIC</b>
----------	--

**9.1** Much of the evidence presented in section 3 and after confirms that there is not an adequate supply of professionals with suitable cross-sector skills, that conservation is a low priority in many planning services, and that conservation expertise can only be made more accessible by framing suitable and specific legislation, and providing core resources.

**9.2** The *Local Authority Conservation Provision Study (LACPS)* of 2003, commissioned jointly by English Heritage and IHBC, comprised data and analysis of conservation staffing resources in England (LACPS, 2003). It remains the most substantial publicly available survey able to inform the current debate on capacity in local government. The main findings of the study were:

- On average, local authorities employ an average of 1.7 specialist staff – a very modest figure for the extensiveness of the resource they need to manage
- Provision is very inconsistent, with some authorities employing a single isolated officer or no specialist staff
- Conservation specialists display a wide range of skills to carry out their work effectively
- Salary and grades levels are low to modest
- Because of limited capacity, workloads tend to be focused on short-term reactive matters rather than long-term proactive initiatives

**9.3** Extensive data collected by IHBC as part of the LACPS study, monitoring of over 950 conservation officer posts since 1998 and local authority Best Value studies has demonstrated a very consistent pattern to conservation officer workload priorities over most types of local authorities (the main exception being county councils). Skills required are reflected in the composition of the workload that the study described:

- specialist Advice on planning, policy and other technical issues
- schemes of Grant Aid (HERS, THIs etc.)
- evaluation of Conservation Areas
- enforcement & Buildings at Risk
- enhancement Schemes

**9.3.1** Priorities in the workload demonstrated that that short-term high pressure workload takes precedence over long-term large-scale and complex workload such as enforcement and quality assurance.

**9.4** The survey included the following conclusions:

*The overwhelming impression emerging from the survey is of a conservation service that is often stretched, under-resourced and operating without many of the necessary ‘building blocks’ that would ensure an effective, efficient and balanced service. Too many authorities hold inadequate information about the extent, character and condition of the historic resource to be managed. This is likely to lead to a failure on the part of authorities to match resources with the scale of the challenge they face. Staffing levels are often modest in relation to the size of the resource to be managed and the workloads faced. Whilst it is*

*clear that the majority of conservation specialists would claim to be covering a very wide range of activities, development control tasks invariably predominate at the expense of other important work. Consequently much of what might be regarded as essential best practice, such as buildings at risk work, conservation area appraisals, enforcement, monitoring and other proactive tasks, inevitably receives comparatively low priority in many authorities.*

*In the context of rising development pressures, it seems unlikely that local authorities will be able to properly address their responsibilities for managing the historic environment without more resources, a national framework of standards and associated performance indicators.*

- 9.5 Feedback from IHBC members indicates that the above situation has continued to decline since 2003.
- 9.6 The ODPM report by Ernst & Young on *Evidence base review of skills for sustainable communities* (2004) confirms that 'Quantitative and qualitative evidence indicates that supply shortages are emerging' in the supply of Conservation Officers. It also notes that 'average [Local Authority] spending on built environment conservation has remained constant over the past 5 years, which translates as a decline in real terms'.
- 9.7 There is a clear need to address the inter-related problems of supply, service, resources and capacity in the sector. This is especially important if the full potential of the historic environment is to be realised, especially through proactive work such as undertaking buildings at risk surveys, action planning, project formulation, bidding, project delivery, formulating area masterplans, regeneration strategies and design frameworks, etc.
- 9.8 The IHBC considers that the effective implementation of the recommendations listed in section 3 will help secure delivery by local conservation and planning services of the support that is essential to the survival of our historic places.



## **10 Conclusions**

- 10.1 Historic places have a key role in delivering a range of social, economic and sustainability objectives. However, these roles have not been fully appreciated, even in the Government's own sustainable communities policy. Progressive erosion of core services has been accompanied by their under-valuing and over-criticism, not least within the sector itself. Cabinet initiatives appear essential to provide the cross-sector agenda that historic places need for their survival.
- 10.2 The initiatives that must accompany the proposals in the Heritage White Paper, including specifying obligations to local authorities, PDG-style investment, and fiscal and planning reform, provide a real opportunity for government departments together to ensure that heritage is firmly integrated with the wider economic, education, social, sustainability and community agendas.
- 10.3 Pursuit of VAT reform on refurbishment works, and securing the control of demolition in planning, would provide the sector with a early votes of confidence in its future. There is also a need to simplify heritage protection and make it more robust. In particular, conservation areas need to be comprehensively reviewed to make the designation process simpler and more consistent. Again the proposals expected inside the White Paper should help address issues.
- 10.4 There is also a desperate and urgent need to review investment in the heritage sector to ensure that the full potential of historic environment resources can be realised. The reduced funding for pro-active initiatives, such as area grant schemes, must be reversed as a matter of urgency. Again the Heritage White Paper proposals, which will bring a significant additional burden on a failing sector, provide both a framework and an opportunity to address these issues.