



· INSTITUTE · OF · HISTORIC ·  
BUILDING · CONSERVATION

*Making Heritage Work*

Dr Peter Wakelin  
Royal Commission on the Ancient  
and Historic Monuments of Wales,  
Crown Building  
Plas Crug  
Aberystwyth  
SY23 1NJ

James Caird  
Consultant Consultations Co-ordinator  
IHBC Business Office  
Jubilee House  
High Street  
Tisbury  
Wiltshire  
SP3 6HA

13 June 2008

Tel (01584) 876141  
Web site [www.ihbc.org.uk](http://www.ihbc.org.uk)  
E-mail [consultations@ihbc.org.uk](mailto:consultations@ihbc.org.uk)

Dear Dr Wakelin

**THE WELSH HISTORIC ENVIRONMENT: TOWARDS A STRATEGIC STATEMENT  
(DRAFT)**

The Institute of Historic Building Conservation (IHBC) is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

The IHBC has welcomed the production by the Historic Environment Group of the draft Historic Environment Strategic Statement as an important step in providing a clear vision and direction for the sector. Equally, the IHBC welcomed the Minister for Heritage's positive response to this initiative as expressed at the conference held on 30<sup>th</sup> April 2008 at the Wales Millennium Centre, and looks forward to the Minister's formal response.

The IHBC has of course already had an input into the preparation of the draft document via its representative on the Historic Environment Group, Neil Sumner. However, IHBC Wales branch members have been canvassed for their views on the draft document and a number of responses have been received. Although a broad consensus has emerged, inevitably in so complex a topic area there is some variation of view particularly in respect of the role that conservation of historic environment plays in delivering sustainable development.

The IHBC considers that it is an impressive document, not least because the production of a committee-authored review of a complex subject is itself an achievement. However, the nature of its authorship has perhaps resulted in moderate language which one member describes as "excessively civil-servant speak", and many have wished that the document was rather more polemic and urgent in tone. Indeed, the IHBC believes that the draft document's somewhat glossy, finished format may regrettably have already discouraged a sense of ownership by the sector.

Page by page comments are set out below:

Page 3 Paragraph 3: The 3<sup>rd</sup> and 4<sup>th</sup> sentences imply that our duty to protect applies only to assets of national or international significance, whilst the wider historic environment is subject to managed change. IHBC suggests change to "*We have a duty to protect the entire historic environment, not only those assets of national or international significance. Nonetheless, it is important that we manage change in the historic environment sensitively and sustainably to retain what is significant to pass it on to future generations.*"

Page 5: Is the table of archival material really necessary?

Page 5 Paragraph 1: Reference is made to the value of investing in the historic environment in underpinning long-term economic development, but is there any available data to support this? Blaenavon is specifically mentioned, so is there for example any data on how many jobs the regeneration of Blaenavon's historic character has created?

Page 8: It would be useful to identify examples of historic buildings that are community assets and are in local authority ownership, but which could be transferred to local groups for community benefit.

Page 8 Actions: Several members have suggested that the Actions should include a bullet point, perhaps at the start of the list, which seeks to build community capacity with regard to the historic environment. Suggested text:

- *Build capacity within local communities to encourage active participation in heritage conservation and management.*

Page 11 A Sustainable environment: This section seems to be somewhat confused in its focus. Discussing the contribution that the historic environment can make to the sustainability agenda provides an opportunity to demonstrate how it can thereby contribute to the delivery of this and other Assembly, agency or governmental objectives. This will open more doors than the heritage arguments can on their own and is one way in which the historic environment can gain the political and financial support it needs. The links can be specifically stated, for example:

- The British Standard "Guide to the principles of the conservation of historic buildings" (BS 7913) states "in environment terms, the continued use of existing building stock ... is a global priority. In global environment terms the balance of advantage strongly favours the retention of existing building stock."
- ODPM report 2004 states "the reuse of historic buildings can be more environmentally sustainable than, and their environmental performance can be as good as, new projects."
- The Sustainable Development Commission in 2005 wrote "existing buildings provide a wealth of opportunities for creating truly sustainable communities. ... The policy framework must support increased use of existing buildings while improving their environmental performance."
- Historic buildings have embodied energy that is wasted if we do not use them; massively wasted if we demolish, dump rubble in landfill and build a new building which is estimated to use as much energy in construction as is required to heat, light and ventilate it for the next 5 to 10 years.
- The New Economics Foundation calculated that there is approximately 70 times more carbon embodied in a new-built office building compared to the basic-grade refurbishment of an already existing building of similar size.
- English Heritage has demonstrated how older houses can cost less to maintain and occupy over the long-term lives than their modern equivalent.

It is also necessary to challenge the general perception held that historic buildings are environmentally inefficient and that heritage legislation and management is at odds with measures to reduce global warming. Many historic buildings constructed pre-1919 are more sustainable in energy-use terms than some of the buildings built between 1919 and say 1975. On the other hand, one member has commented "Actions to reduce carbon emissions may indeed present conflicts such as the insensitive alteration of historic buildings. However, by refusing to allow owners of energy-consuming listed buildings alter their buildings to reduce energy consumption is wilfully to maintain existing carbon discharges and to increase the rate of climate change. It does not add to sustainability.... The addition of e.g. solar water panels, draught lobbies, small passive sun space - all relatively lightly attached and removable - could be considered for all Grade II buildings, with the caveat that this would be allowed only after the basics had been completed (draught stripping, cylinder and pipe lagging, roof space insulation if there is a roof space, efficient boiler and controls).... Historic buildings are likely to be part of the problem and their continued use unaltered is justified only if it can be shown how the energy footprint of continued use is to be compensated for by being distributed over the remaining non-listed building." This demonstrates that there is no easy fit for historic buildings into the sustainability agenda.

Page 11 Specific comments on this section:

- Paragraph 1: It seems odd to start the section by discussing Historic Landscapes. Instead it should commence with a general discussion of the historic environment's potential contribution to the sustainability agenda.
- Paragraph 2: Decaying buildings need more than "greater leadership and partnership working." Also needed are greater resources at a local level, and at a level in the local authorities sufficient to influence policy. Suggested text: *"Some prominent historic buildings and sites have continued to decay for many years: greater leadership, partnership working and resources at a local level are needed if we are to save these for future generations. Greater resources are needed within local authorities sufficient to influence policy and to deliver a consistently high quality historic environment."*
- Paragraph 2: The reference to the unequal burden of VAT should be amended to *"an artificial incentive for demolition or alteration..."* since alterations usually require LBC which then enables the potential recovery of VAT.
- Paragraph 2: The following sentence should be amended to *"Investment in extending and altering buildings may if not properly managed damage historical integrity...."* Whether they do damage or not relates to the quality of the control and design process.
- Paragraph 2: The following sentence should be amended to *"Throughout Wales... and the use of appropriate materials and techniques".* IHBC considers that this point could be developed further. There is no recognition of the fact that insensitive alteration to historic buildings is often at the behest certain branches of local government and the Welsh Assembly Government e.g. the indiscriminate application of Building Regulations and housing grants conditional on carrying out damaging works. In the private sector mortgage companies make inappropriate works a binding condition of loans. The demand to expend funding on inappropriate alterations to listed buildings is often in disregard of the statutory requirements and places unreasonable pressure upon local authority conservation officers. The IHBC was encouraged by the Minister's comment at the 30<sup>th</sup> April conference that currently there are discussions concerning a general duty being placed upon local authorities to have regard to the cultural heritage in all their decision making.

- Paragraph 3: It isn't just derelict sites that need to be retained for protected species, since some of the most difficult problems arise from trying to protect species such as bats in living, working, buildings. The historic environment needs, where reasonable, to be as robust as it can about its significance being equal to, not secondary to, nature conservation interests.

Page 12: The challenge of climate change is discussed only in terms of the impact upon archaeological sites. Historic buildings can equally be affected by river flooding and coastal erosion. Do the 86 and 5,714 identified sites include listed buildings? (This is a good example of an apparent tendency in the document to use archaeological, in preference to historic building, examples.)

Page 12 Actions: In the light of the above, IHBC suggests there is a need for another over-arching action point along the lines of:

- *"Encourage the sensitive re-use and adaptation of historic buildings, whilst improving their environmental performance where appropriate."*

Page 12 Actions: IHBC suggests the 1<sup>st</sup> bullet point is amended to:

- *"Seek solutions to the continuing decay of key sites and buildings by identifying resources, working together and filling leadership vacuums."*

Page 12 Actions: IHBC suggests the 2<sup>nd</sup> bullet point is amended to:

- *Promote the adoption of appropriate maintenance, repair, and upgrading regimes for historic buildings by all bodies involved in specifying and financing such works.*

Page 12 Actions: Whereas the important consideration is to remove the tax disincentive to repair and maintenance, it could be argued that rather than advocating the "equality of VAT between refurbishment and new build" the emphasis should be upon giving preferential treatment to the maintenance and repair of historic buildings, i.e. by imposing VAT on new build and alteration and zero-rating maintenance and repair of historic buildings.

Page 14 Actions: IHBC suggests that the action point *"Maintain a robust planning system supporting....sensitive development"* would be more appropriately included in the Organization and Delivery action points on Page 15.

Page 15 Paragraph 1: There is no specific reference to the value of conservation areas as practical working examples of the benefits of conservation and the also of the value of conservation area based grant schemes (THI, TSP and TIG) to urban regeneration. There is no explanation for the uneven designation and management of conservation areas. One member thought the references to the variable expertise in local planning authorities was unhelpful. Another member states "If a local authority does not back up its conservation officer with money to give out in grants and legal powers to enforce repairs, change of ownership etc., it would be better for that salary to be taken from them and passed on to local BPTs as grants or to a centralised enforcement section within Cadw. In addition, when this transfer of money and power happens, the LA should have its legal section penalised for failing to fulfil its statutory duties on the grounds that the public's interest is not protected by employing spineless legal officers. LAs need to know with certainty that protection of listed buildings is a high-priority statutory duty requiring energetic action."

Because enforcement procedures are overly complex and time consuming and planning departments are already fully stretched on applications, at present there is a perception that it is too easy to get away with unauthorised works.

The IHBC has for many years been concerned at the level of conservation expertise available to all local authorities in Wales, and the status and value accorded to their conservation officers. In the light of the draft Heritage Protection Bill and its implications, the IHBC will be undertaking a review of this later this year.

The IHBC suggests the following amendment:

*"...gardens and historic landscapes. Conservation areas celebrate local historic environments and distinctiveness and provide practical working examples of the benefits of conservation, whilst conservation area based grant schemes (THI, TSP and TIG) provide value to urban regeneration initiatives. However, local planning authorities are often unable to devote sufficient resources to designating and managing conservation areas. Furthermore, the varying status of local authority conservation staff and varying levels of resource devoted to managing the historic environment mean that the controls exercised via listed building consent and conservation area consent procedures vary in their effectiveness. As well as being overly complex, the enforcement procedures are time consuming and easily given low priority, with a result that at present there is a perception that it is too easy to get away with unauthorised works on historic buildings.*

Page 15 Actions: In order to deliver the above, IHBC suggests an additional action point:

- *Strengthen local planning authority conservation staff and financial resources to strengthen listed building and conservation area management, and planning enforcement as applied to the historic environment.*

Page 16 Actions: In order to maintain local vernacular character and to increase the sustainability of building conservation projects, encouragement should be given to favouring locally sourced materials, e.g. local quarries. IHBC suggests the second action point is amended to:

- *Reinforce and celebrate local distinctiveness through retention of traditional building detail, use of locally sourced building materials, and sensitive design.*

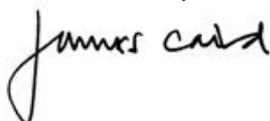
Page 16 Actions: In order to tackle the point made about identikit retail parks, offices and housing, IHBC suggests an additional action point:

- *Engage with national developers and raise their awareness of the distinctiveness of the local historic environment.*

Several members felt that the document lacked an actual strategy or implementation mechanism. We believe that this is a misunderstanding of the nature of the document which is intended to draw the Minister's attention to issues and opportunities facing the historic environment in Wales, and to identify possible priorities for action. It is for organisations, from the Welsh Assembly Government to the smallest voluntary heritage group, to determine their own priorities for action.

We trust the above observations will be useful in preparing a final draft document for approval by the Historic Environment Group.

Yours sincerely



James Caird  
Consultant Consultations Co-ordinator