



INSTITUTE OF HISTORIC BUILDING CONSERVATION

Neil Johnson
Senior Parliamentary and Policy Officer
Royal Institution of Chartered Surveyors
12 George Street
Parliament Square
London
SW1P 3AD

Mr David J Chetwyn, MA, MA, MRTPI, IHBC
Vice Chair
Institute of Historic Building Conservation
142 Richmond Street,
Penkhull,
Stoke-on-Trent,
Staffordshire,
ST4 7DU

Tel: 01782 413896
Mob: 07974 099635
E-mail: vcpolicy@ihbc.org.uk

14 January 2005

Dear Sir

Asset Management in Local Government - RICS Draft Guidelines

I refer to the above consultation document.

The Institute of Historic Building Conservation is the professional body for the United Kingdom representing conservation specialists and 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 draft document is thorough, helpful and informative, if a little clinical in style. The guidance would benefit from Plain English at a number of points – particularly in place of jargon phrases in quotes: e.g. “first and second cut” (page 6); “status quo benchmark option” (page 7). These are unlikely to resonate with non-property officers or elected members.

It is noted that buried within the document are injunctions “to ensure performance management is not over complicated” (para 5.1.2 (page 57) and that “Asset Mangers do not lose sight of the fundamental objectives...” (page 58). It is suggested that if the boxes setting out the “key actions” were brought together in one place instead of scattered throughout the document, the advice would be clearer.

The Institute is concerned over the lack of reference to, or appreciation of, historic environment considerations. Almost all authorities will have heritage assets of some kind, many will have substantial holdings. English Heritage estimates that 17% of all listed buildings ‘at risk’ are local authority owned. It is unclear if the historic environment is intended to be covered by references to “environmental objectives” (which first appears on page 37), but this is not adequate. Indeed there is

INSTITUTE OF HISTORIC BUILDING CONSERVATION

little acknowledgment that local authorities may pursue environmental corporate objectives (Guidance in Outline para 2.7).

The document needs to emphasise the key role played by historic buildings and areas in delivering urban and economic regeneration, and in achieving the objectives of the Government's Sustainable Communities policy. This was recognised in the recent ODPM Select Committee Report on "The Role of Historic Buildings in Urban Regeneration" (July 2004). Local authority owned historic building assets have often been used to deliver regeneration projects and to act as a catalyst for wider regeneration. In particular, the historic environment has a crucial role in catering for small business development, innovation, and creative industries. The regeneration and repopulation of inner-city areas has also often relied heavily on historic buildings and areas.

There should be a clear sense of the historical dimension and acknowledgment that some property holdings may have been acquired or managed for reasons other than function or revenue generating purposes. The value of emotional attachment, local historical association, civic pride, image, and community spirit and cohesion need to be appreciated.

The phrase "listed and historic buildings" appears only once in over 100 pages of the two texts (only in the Guidance in Outline para. 2.8). There needs to be reference to the other kinds of statutory protection such as Scheduled Ancient Monuments, designated conservation areas and registered historic parks and gardens. Despite numerous references to statutory "codes" such as "legionella" there is no reference to the statutory requirements of listed building and ancient monuments legislation (see page 26).

In referring to the interface with Councilors and non-property professionals in local authorities there needs to be reference to the initiatives promoted by the ODPM and DCMS to appoint or nominate Historic Environment and/or Design Champions who's brief extends to the proper management of historic property and or buildings of architectural quality.

The authors need to be aware of the English Heritage "Managing local authority heritage assets" document June 2003 sponsored by ODPM (and DCMS). This document does not currently appear in Appendix B: Bibliography and Further Information.

The authors also need to be aware of the ODPM/DCMS Best Value Performance Indicator initiatives on local authority owned heritage assets that have been in progress for the last 12 months. The piloting took place in the Autumn of 2004 and at the time of writing the BVPIs are intended to be introduced in April 2005.

In dealing with capital receipts & disposals the document needs to make reference to the importance of the ODPM's Disposal Consent Regulations 2003 which permit disposal of heritage assets for less than best consideration for economic, social or environment considerations where valued at under £2M.

There should be cross-reference and bibliographical reference to the RICS own publication (jointly with English Heritage) on the Economic Performance of Listed buildings.

Page 1 refers to goals and objectives. It also needs to refer to statutory responsibilities and duties (indeed, this is necessary throughout the document).

Page 3 refers to examples of corporate issues. One of the most crucial issues, absent from the examples, is Fire Risk Assessment (the reference on page 17 is not adequate).

Page 17 refers to "compliance with the Council's range of obligations...". It needs to make clear that this includes compliance with statutory consents.

Page 48 refers to actions required in project planning (para 4.52). Obtaining and complying with statutory consents needs to be one of these.

Page 55 refers to sustainability criteria, but without any reference to the crucial significance of historic environment considerations. Clearly, refurbishment of historic buildings and areas is a very sustainable form of development.

INSTITUTE OF HISTORIC BUILDING CONSERVATION

Page 61 in referring to non-operational property needs to make recognition of the holding of property for environmental considerations (or historical or public pressure reasons) especially listed buildings and/or ancient monuments. Historic buildings will not necessarily meet the criteria set out in the list (a) to (j) on pages 61-61. Similarly on page 65 listed buildings may not respond to arbitrarily applied space utilisation standards.

Page 67 needs to recognise that the documenting of listed buildings (and the grade) and scheduled ancient monuments a fundamental element of data management.

Pages 72-4. deal with “understanding...” but need to demonstrate understanding of the statutory constraints posed by historic environment property holding.

I trust that these comments are helpful.

Yours faithfully

A handwritten signature in black ink, appearing to read 'D. Chetwyn', is written over a light grey rectangular background.

Dave Chetwyn
Vice Chair