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Dear Sir

Consultation on draft guidance document: '*Conserving Georgian and Victorian terraced housing: A guide to managing change*'

Dear Sir,

The Institute of Historic Building Conservation 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.

We are very pleased to have the chance to comment on the consultation document. The Institute's comments are as follows:

Observations in relation to Part 1:

The draft document extends the London focus of its preceding guidance which is welcomed. It also widens the date range with which it is concerned by acknowledging that the terrace emerged as a building type in the late 17th Century. One might add that the evolution of the terrace did not come to an end circa 1900 either. If the Georgian Group specialises in the architecture of 1700-1840 and the Victorian Society covers buildings from 1837 to 1914, then it may be worth extending the coverage of this document to c1700-1914. Terraces built during the reign of Edward VII (1901-1910) have been around for over a century. They have stood the test of

time and contribute positively to the character of our towns and cities. They need and deserve our attention and could benefit from being included in the remit of the guide.

Since the draft guidance now applies to a broader geographic range of locations of terraced houses in different urban contexts it would be important to highlight, document and protect regional variation. If more emphasis were to be placed on the individual differences then it would also be better understood that no one approach will ever fit all.

Whilst the guidance works through the individual elements of a structure in the context of change and it flags the need to take into account regional differences in materials and finishes etc. There should be more information on the construction and structural strengths and weaknesses, including the well-known issue of front and rear walls not always being sufficiently tied in to the party walls and the importance of the timber-work (joists, wall-plates and stud partitions) to the overall stability/resilience of the structure.

The new guidance should highlight the need for caution concerning the large numbers of listing descriptions, especially in London which describe the front elevation only and often fail to distinguish the architectural nuances/differences within terraces precisely because there is no acknowledgement that many built after c.1810 were [a] not built as complete terraces and [b] were the result of pattern books and often built in twos and threes. The importance of pattern books in the history section should be emphasised. There was often a standard formula derived from pattern books such as the *Practical Builder* of 1823 by Peter Nicholson and although there was an abundance of books on building published between 1714 and 1825, those written early in the Victorian era still put forward the same stock solutions, as had been the case a century before.

The guidance could refer to the fact that in London, for example, but also elsewhere, building activity increased after 1805. From 1810 to 1830 much of London's development took the form of the lining existing country roads radiating out of the capital with neat terraces while new roads opened up previously inaccessible land for building with new squares and terraces laid off the new highways.

The guidance could also document that speculative builders who were financing development were motivated by the urgent desire to run up houses as quickly as possible and were not interested in architectural set-pieces or squares although they had an eye for larger scale general effects - but eventually whole streets began to

be leased for development because this was more economic than building on two or three house plots at a time.

Two other small but crucial points worth making would be to emphasise that

1. the intactness of one interior will not necessarily be true of all of the terrace and individual properties may vary. Just because the listing investigator may have seen a good staircase in one property does not mean that the remainder of the terrace is the same
2. staircases often survive (and are a useful dating indicator) because they are usually part of the structure and expensive and difficult to remove.

IHBC welcome the fact that the new guidance will be illustrated. Appropriate illustrations will be most important in this document. The annotated diagrams in the earlier guidance were very useful and there were some really useful cut-away drawings illustrating structure and layout. It is hoped that these can be re-used or adapted.

The comment suggesting the greater the impact the greater the justification for change will need to be, is important as is the statement that for assets that are particularly complex or significant or applications involving complex proposals further specialist expertise may be required. This could be expanded more to assist owners to know where to seek that specialist advice especially if Historic England is considering a separate publication for building owners and occupiers. The guidance should refer to the Ancient Monuments Society as the statutory amenity society dealing with buildings of all periods and other potential resource bodies such as the Georgian Group and the Victorian Society.

In relation to plan-form it would be useful to have more information concerning the current fashion for opening up of rear ground floors or basements to create large living spaces. What is the acceptable level of intervention?

In relation to extensions there should be more detailed advice on roofs and the importance of original fabric and again the degree of intervention which might be appropriate, particularly the change from valley roof to mansard or insertion of dormers/rooflights.

Also there needs to be a mention of the threat of basement extensions - now no longer just an issue in Inner London - spreading to the suburbs and beyond. The authors could benefit by

looking at the policies and guidance produced by the Royal Borough of Kensington & Chelsea.

Further information is needed about factors to consider when planning alterations to upgrade for reasons of energy efficiency and links to resources.

Overall, this is an informative document and some useful linkages are generated to other advice of relevance. The new guidance is more immediately accessible for owners as well as for Local Authority decision-makers. There are panels inserted through the document which pose questions which are very useful in the context of considering change.

Part 2: Consultation on a potential future guide for owners

A further document for owners might provide more information on:

- The importance of carrying out ongoing preventative maintenance of the structure the importance of carrying out appropriate repairs and renewal of fabric in historic buildings
- Advice to owners and occupiers to check Local Planning Authority policies and advice.
- Information could be given about the planning process itself and ways of accessing appropriate advice before advancing a project and prior to planning so as to clarify a pathway to implement changes.
- Guidance for owners about when and where to seek specialist advice.
- The guidance should refer to the Ancient Monuments Society as the statutory amenity society dealing with buildings of all periods and other potential resource bodies such as the Georgian Group and the Victorian Society.
- There could be further detailed guidance on individual elements of the physical fabric under the headings of form, fabric and materials and references to technical resources in terms of advice and where to find assistance and providing links to resources.
- Further information explaining the importance of context and setting for an historic building and links to resources
- Further information about factors to consider when planning alterations to upgrade for reasons of energy efficiency and links to resources

In relation to Part 2 b) concerning other online or printed sources of information to which such a guide could usefully refer :

- 'The Art of Georgian Building', Dan Cruickshank & Peter Wyld by Architectural Press is a key publication.
- 'Period Houses and their Details', Ed. Colin Amery, Architectural Press;
- 'Fixtures and Fittings of Dated Houses 1567-1763',
- Practical Handbook in Archaeology, N A Alcock & Linda Hall, 11, CBA.

We hope these remarks are of assistance,

Yours sincerely

Fiona Newton
IHBC Operations Director