



INSTITUTE OF HISTORIC BUILDING CONSERVATION

Heritage Counts 2003
English Heritage
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Dear Ben

Heritage Counts 2003

I refer to the above document.

The Institute of Historic Building Conservation is the professional body representing conservation specialists and practitioners in the public and private sectors in the United Kingdom and the Republic of Ireland. It has around fourteen hundred members divided between fourteen branches. 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 welcomes Heritage Counts, which builds upon the previous State of the Historic Environment Report. The increase in hard data is strongly welcomed and the IHBC is pleased that the LACPS results have been widely disseminated. There is a need for consistent year-on-year measurement to establish trends, for example through a repeat of LACPS. Future documents need to deal with the issue of lack of, and need for, professional conservation skills.

It would be useful to include information on the current national perspective on building conservation. This could include discussion of the number of Government consultations impacting on the historic environment (the IHBC provided written responses to 22 consultations in 2003). There could also be information on how the Government is addressing the historic environment in terms of ministerial responsibilities.

Future documents should shift the emphasis towards the places and buildings that people use everyday, rather than just visit. Whilst heritage related tourism is clearly an important part of the overall picture, the heritage sector really needs to concentrate on the wider social, economic and environmental benefits of the historic environment, as a place to live, work and spend leisure time, and in the creation of more sustainable and effective approaches to regeneration.

On the detail of the document, the Institute would make the following comments:

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The Historic Environment Assets (Part 1) provides a good introduction to the various designations and to some specific uses, such as housing. It would be useful to add sections on business uses and leisure. Emphasis should be made of the contribution of the historic environment to the creation of sustainable communities, and relevance to the proposed new PPS1 (draft). The inherently sustainable nature of reusing existing buildings should be emphasised. In 1.1.5, the unsustainable nature of continuing traffic growth should be highlighted, in addition to the negative social, economic and environmental impacts. It may also be useful to mention the blighting effects of road pollution, sometimes restricting the use potential of nearby buildings.

In 1.2.4, the proposal to undertake research on change in conservation areas is welcomed, and this can help to reinforce the case for reform. Indeed, the IHBC would like to see greater emphasis made of the need for reform of conservation areas. In particular, the designation of a conservation area needs to automatically remove a range of permitted development, without the need for the over-complex and time-consuming Article 4 procedure. Most conservation areas have inadequate protection due to the resource implications of preparing Article 4 Directions. The recent DCMS consultation paper, *Protecting Our Historic Environment*, failed to address this issue.

Under historic parks and gardens (1.2.5), the primary aim should be for new legislation to be introduced to give proper statutory protection to those included on the register. Conservation areas and listings are not really adequate tools to deal with the management of soft landscape.

The Regeneration part of the Document (Part 2) is of key importance, and contains much useful material. The figures for investment and outputs relating to Grainger Town are very compelling. It would be useful to emphasise such case studies with headline quotes and illustrations. Liverpool Ropewalks would also be a useful case study.

There are ways in which the regeneration part of the document can be strengthened even further in future documents. It may be useful to refer to the work in the USA undertaken by Donovan Rypkema (see attached) and it would certainly be useful to include similar statistics relating to the UK on matters such as incomes and jobs generated by investment in historic buildings. The role of historic buildings in accommodating small businesses, incubator units, creative industries, hi-tech firms, etc should also be addressed. It would be useful to include material on the use of the historic environment by public authorities and developers as a means to improving the image of local areas, and creating new marketing opportunities. A key theme should be the delivery through heritage regeneration of more sustainable economic growth. Possibly the most useful issue to address would be the impact of the historic environment on productivity, though this is clearly a complex area, requiring in-depth research.

In 2.3, 'The Value of Historic Homes', it should be noted that children and young people often have very different views on the desirability of different kinds of accommodation, especially high-rise flats, as highlighted by the work of the Hackney Building Exploratory.

It would be useful to include figures on embodied energy in 2.4.

In 2.5, it is necessary to include the huge contribution made to heritage regeneration by mainstream regeneration funding, such as ERDF, Regeneration Zones, etc. The section on Urban Splash should be expanded to include other specialist private developers. It would be useful to include projects by such developers as case studies, to emphasise the regeneration potential of the historic environment.

The importance of tourism to areas of industrial decline should be discussed in 2.7. For example, In the Potteries (North Staffordshire), tourism now accounts for more employment than the pottery industry. It would be useful to include figures on expenditure in the wider local economy triggered by visits to heritage attractions.

The 'Private Owners' section under 2.8 could be potentially misleading. To be properly inclusive, this needs to address all houses in private ownership, not just those open to the public. An extensive MORI poll of private owners should be undertaken, with prior consultation on the questions to ensure relevance and useful outcomes.

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The lack of mention of the impact of State Aid restrictions under the Treaty of Rome is a serious omission from the document. A State Aid section should be added, dealing with the three new heritage-related notifications. There should also be discussion of future provisions, after the existing notifications expire in 2006. In particular, it would be useful post 2006 for the principle of environmental enhancement to be incorporated in heritage state aid provisions, as is the case with the land remediation notification, rather than just market failure.

Under Part 3 of the document (Outreach, Knowledge and Access) there is a need to map the regional skills base (as per the SW Region document) at a UK wide level. This should deal with local materials and traditions.

There is a need to audit provision for the historic environment within the Government's Skills Strategy, including progress on occupational standards, Sector Skills Councils, Employer support, and information on national and regional delivery of training initiatives including Centres of Vocational Excellence providing conservation training. Also of relevance is the number of grant-aided projects providing specialist training.

In 3.4, the role civic societies in providing scrutiny of development proposals or public sector projects should be mentioned.

An audit on progress in relation to DDA compliance would be useful.

The provisional indicators for the historic environment are generally welcomed. Other areas for investigation include:

- provision of improved/new business floorspace,
- creation of new dwelling units,
- jobs created (either through construction or permanent jobs associated with new uses of buildings),
- refurbishment of vacant and/or derelict buildings,
- area of land/urban spaces improved,
- professional conservation skills,
- provision or accommodation of new community facilities.
- number of historic environment champions
- number of additional conservation staff funded through the planning delivery grant
- number of additional staff funded by English Heritage or other heritage sources
- evidence of long-term commitment, for example through the proportion of conservation staff on permanent rather than temporary contracts

It would be useful to include some mention of PFI projects involving historic buildings or areas. In particular, the Institute has concerns over the setting of budgets through tendering at too early a stage, before detailed design works have been undertaken. This effectively places a quality ceiling on the process, enforcing sometimes unacceptable compromises on the detailed design process due to unrealistic budgets.

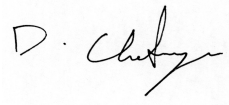
The IHBC welcomes the regional publications under Heritage Counts. The East Midlands version of Heritage Counts was published by English Heritage on behalf of the East Midlands Regional Heritage Forum. The document contains the action plan of the Forum on the inside front cover. This plan has been produced by the Forum and includes a number of excellent aims such as 'Briefing the Chief Executives and relevant lead Members of local authorities on heritage issues, including tourism; social, economic and planning benefits; and the current fragility of resources'. It would be beneficial for all regional documents to adopt this inclusive approach.

It would also be useful for the regional documents to be illustrated and include meaningful case studies, so as to target the professional market and better engage the public.

I trust that these comments are helpful. Please do not hesitate to contact me if you wish to discuss any of the above matters further.

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Yours sincerely

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

Dave Chetwyn
Consultations Secretary