



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

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Dear Mr McKervey

PROPOSALS FOR THE HISTORIC BUILDING GRANT-AID SCHEME

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 Institute welcomes the opportunity to comment on the consultation and is broadly supportive of it.

The Institute is pleased to see the document set out within the framework of the Burra Charter and hope that the final grants document will do likewise.

The Institute's answers to the questions posed in the consultation are as follows.

PP1. Do you agree with the proposal to extend grant-aid to the B2 category for secular buildings?

The Institute supports this proposal with one reservation. It is frequently the case that grant regime funds are insufficient to cater for the demand for grants as anticipated in the commentary on Policy Proposal 2. We would not wish to see the extension to eligibility give rise to applications for grants for higher graded buildings not being approved. It may be that resources could be made to stretch further if aid was in the form of interest free loans where a financial return on the property might ultimately be expected. This would be compatible with the principles suggested for a revolving fund for Building Preservation Trusts.

PP2. The proposal is that a single rate of 35% grant-aid on eligible costs would be beneficial to assisting with the cost of the repair and maintenance of listed properties.

Whilst a one-size-fits-all approach is simple to administer, it runs the risk of grants being made at levels not strictly speaking required to the expense of other schemes. The Institute would prefer the grant rate to be a maximum, subject to demonstration of need. The Institute supports flexibility in dealing with buildings with no economic use.

PP3. The proposal is that all professional agents or designers engaged on grant applications should be suitably qualified and/or experienced as defined by EHS, or an independent professional selection body.

The Institute supports this proposal. Any independent selection should accept qualifications and experience on as wide a basis as is consistent with ICOMOS standards.

PP4. The proposal is that works resulting in the removal of any original character will not be grant aided.

The Institute has concerns about this proposal. Clearly works of removal of character should not be grant aided. The Institute would like to see this worded to make it clear that the unnecessary removal of original character would remove eligibility for grant for the whole project. A protocol would be needed to establish the boundary between works that were necessary for the long-term health of the building and those that were not.

PP5. Do you agree with the principle of extending grant-aid to preventative maintenance works in future years?

The Institute gives this proposal cautious support. There is a clear case for works of one-off preventative maintenance being grant-aided. We are less sure about anything that is recurring as reassessment of appropriateness would be necessary on a frequent basis to ensure that best practice were being followed. The Institute would be interested to receive a copy of the pilot study report so that any experience could be more widely considered.

PP6. Do you agree that the existing grant policy relating to thatch work should remain unchanged?

The Institute supports this proposal on the assumption that existing practice does not have a disproportionate impact on the availability of funds.

PP7. Do you agree that the following elements/components should be grant eligible? For example:- organs, in churches, etc.; setting elements, such as cobbled courtyards; clocks, in bell towers, cupolas, etc.; other elements within the curtilage of a Listed Building.

The Institute supports the grant-aiding of works to any feature that can be said to form part of the special interest of the building. Often the boundary of this will be in the listing description or other published work or in correspondence over applications for listed building consent. Where this is not the case the Institute would support an approach based on careful assessment of the circumstances.

PP8. Should a condition of grant-aid be to provide access to the building on particular occasions, for example public access could be made available on two European Heritage Open days in a five year period?

The Institute supports this proposal in principle but questions the extent of its applicability. Certainly the proposal should apply to cases where grant-aid has been made for extensive interior work. We are less certain about whether it need apply to a grant for thatching. There will be a variety of other cases within these extremes.

PP9. Do you agree that the existing grant policy relating to eligible individuals should remain unaltered? If not, what are your proposals?

The Institute supports the principle but has no comment on the range of eligibility or its extent.

PP10. The proposal is that the existing grant policy relating to ecclesiastical buildings should remain unchanged. If you disagree, what are your proposals?

The Institute does not wish to comment on the question of ecclesiastical exemption, but would wish to see grant-aid based on the quality of the work proposed in the context of conservation best practice.

PP11. Are the above proposals, to provide funding to Building Preservation Trusts, appropriate?

The Institute supports a pro-active approach to listed buildings at risk and the proposal to make BPTs a focus for this. The proposal for supported technical aid echoes successful initiatives elsewhere. The emphasis should be on quality of outcomes rather than process mechanisms.

PP12. £500K represents a significant proportion of the Historic Buildings grant-aid budget. (a) Is this figure appropriate, and (b) is a revolving fund structure appropriate?

The Institute supports this proposal. The revolving fund structure is appropriate as it is used successfully elsewhere, but we are unsure about the scale of the proposed fund. The target is stated to average 20 restorations per year. This allows only £25,000 per scheme on average. This seems a bit light bearing in mind that in the early years there will be few funds "revolving" back into the fund.

PP13. Is this the most appropriate method of providing funding?

The Institute supports good track records being rewarded. Might consideration be given to allowing a BPT that is delivering quality outcomes to revolve funds internally subject to audit? This would allow better planning of work and more quickly revolving resources.

PP14. What are your views on a third party, specifically AHF, managing this funding for EHS?

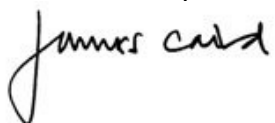
The Institute supports this proposal subject to the AHF having sufficient NI expertise and presence.

PP15. Are the above conditions for an offer for funding appropriate? Are there any other conditions you believe should be included?

Clawback of gains and returns within a specified period (say 5 years) should be a feature of any grant regime.

We hope these comments are useful.

Yours sincerely

A handwritten signature in black ink that reads "James Caird". The signature is written in a cursive style with a large, looping initial 'J'.

James Caird
Consultant Consultations Co-ordinator