



INSTITUTE OF HISTORIC BUILDING CONSERVATION

State of the Historic Environment Report
English Heritage
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20 February 2003

Dear Sirs

State of the Historic Environment Report 2002

I refer to your invitation for comments on the above document.

The Institute of Historic Building Conservation is the professional institute, representing conservation professionals 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 and to support the effective protection and enhancement of the historic environment.

The Institute welcomes the document and recognises its importance in providing for the first time an audit of the whole sector, enabling the shortcomings as discussed below to be identified. The document appears to draw on the forthcoming Local Authority Conservation Provision Survey, a joint project of the IHBC and English Heritage. It is hoped that this Study will feature prominently in the next SHER report and provide a blueprint for action to strengthen this key role.

The IHBC looks forward to the further development of SHER as a basis for information about, and resourcing of, conservation provision in the future. The SHER sets a precedent for similar work at local level, and we look forward to English Heritage and Government support for this.

The IHBC would make the following comments on the detailed content of the document:

- 1.1.6 The report refers to the private rented sector having the highest levels of disrepair. Such properties, especially where there is an absentee landlord, are often associated with inadequate maintenance, social problems, a lowering of property values, and short-term tenant occupation. They can often cause considerable harm to the quality of life of established communities and can even make some areas unviable. Much stronger powers

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are required to allow local authorities to address these problems, including powers to require repairs and, where appropriate, a fast-track procedure to acquire properties.

Table 8 The figures in this table illustrate the chronic under-representation of the 20th century on the statutory lists. This has a number of unfortunate side-effects (see comments below). Clearly, scarcity of survival is a major factor in the earlier periods. In later periods, scarcity is a lesser factor and listing requires more of a qualitative analysis (though scarcity can be a factor even in very recent buildings such as war structures and temporary housing). However, the drop from more than 30% for the 18th and 19th centuries to 3% for the early 20th century (0.2% for the post-war period) highlights the serious risk to the largely unprotected heritage of this era. Whilst some reduction could be expected due to the scarcity factor, this does not account for such a dramatic drop. Primary works of the 20th century remain unprotected. This problem is also illustrated by the low grades afforded to more recent buildings. Whilst the leading works of past centuries are listed at grade I and II*, many leading works of the 20th century only attract a grade II status. As so few works of the post-war years are listed (i.e. the most significant works) they would be expected to all warrant high grades. The IHBC is very concerned over the low priority given to the built heritage of the last century. Required actions include giving a high priority to thematic reviews relating to the 20th century and placing the 20th Century Society on the same footing as other Statutory Amenity Societies such as the Victorian Society.

1.2.3 The statement that local lists ensure greater consideration is given to retention is potentially misleading. In fact, such lists afford no protection against the loss of buildings, merely closer scrutiny of proposed alterations and extensions.

Inclusion in a local list has become increasingly significant with the special provision made under the Building Regulations (Approved Documents L1, L2 and E, and Draft Part M) for "historic buildings" - including listed buildings, buildings in conservation areas, and buildings of local interest identified in a Local Authority's Development Plan. These provisions illustrate a few of the many interactions between heritage legislation/designations, and other legislation which need further assessment in future SHER reports.

Regarding buildings at risk, consideration needs to be made of reviewing grant programmes to facilitate the support of single listed buildings. Schemes such as HERS and the HLF's THI programme deal with area regeneration. In rural and urban areas, much of the historic environment is more fragmented in nature. It can be very difficult to obtain funding for single buildings, especially if they are listed grade II and/or are small in scale. Consideration should be made of establishing grant schemes relating to much larger areas (Wards or Districts). These could perhaps be targeted at areas with a much higher than average proportion of buildings at risk. Such schemes would introduce a more strategic dimension to heritage funding.

The report needs to recognise the risks to ecclesiastical buildings caused by the failure of some dioceses to follow the correct ecclesiastical exemption procedures. For example, in some areas, local authorities are not being consulted, provided with plans or allowed 28 days to respond. The practice of distributing diocese meeting agendas as a substitute for the proper consultation procedure is clearly inadequate.

1.2.4 There is a need to obtain data on conservation area applications that are not notified to English Heritage.

Conservation Areas are now a deeply flawed designation. The character and appearance of conservation areas are being eroded through a combination of demolitions and permitted development. The Shimizu ruling, the weakness of controls brought about by designation, the complexity of Article 4 procedures, and limited staff resources all contribute to this problem, leaving most conservation areas with inadequate protection. The Planning (Listed Buildings and Conservation Areas) Act 1990 needs to be reviewed, particularly with regard

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to demolition. The current review of permitted development being undertaken by the ODPM should tighten permitted development rights in Conservation Areas.

Inclusion on the register of Historic Parks and Gardens is an even weaker designation. This needs to be strengthened to provide control over demolition, layout, and perhaps planting.

- 2.1 The figures on embodied energy provide a robust and dramatic case for the refurbishment of buildings rather than demolition and redevelopment. Steps should be taken to promote awareness of this factor, especially to Government ministers and departments.
- 2.2 The part of the document dealing with regeneration needs to be greatly strengthened. Although it makes a number of good points and contains some useful case-studies, it does not deal with certain fundamental issues, and fails to make the strongest case for heritage (and design) led regeneration.

There is no mention of the impact of European State Aid rules on heritage-led regeneration, following on from the European Commission's 1999 decision on the English Partnerships PIP. There is no mention or analysis of the likely benefits and short-comings of the UK Government's 'Historic Environment Regeneration Scheme', English Heritage and Heritage Lottery Fund Article 88 Notifications. These are fundamental issues affecting the funding of heritage regeneration projects and should be fully addressed by the document.

The document also needs to deal with private sector-led heritage regeneration. Forward-looking developers (Urban Splash, etc) have consciously targeted historic buildings and areas as a key element in their development philosophy. The North-West and North-East regions in particular have seen dramatic examples of area regeneration, led by the private sector, and based on a design and heritage-led approach. The Concert Square/Duke Street area of Liverpool provides a particularly good example. In some instances, the acquisition of property by 'name' developers has in itself triggered an increase in confidence and land values. There is a need to aggressively promote awareness of the role played by the historic environment in a range of very successful and high value regeneration schemes around the UK and Europe. There still appears to be little appreciation in Government of this role. In addition, a high priority should be given to undertaking research into design and heritage-led regeneration as a means to facilitating economic development and securing urban renaissance. Such research should inform the development of new regeneration policies and perhaps new area designations (see attached note on 'Urban Renaissance Areas').

More research into the impact of statutory protection on the value of dwellings should be undertaken. One of the great weaknesses of the Heritage Policy Review and subsequent documents has been the failure to assess the views of, and issues affecting, the owners of historic buildings not open to the public. This needs to be addressed in future SHER studies.

The document states the risk of maximising the development potential of brown field land creating developments that are out of scale with their surroundings. This statement perhaps relates to the South East Region and other parts of the UK with high land values. In many parts of the UK, especially where demand for land is relatively low, the problem is more from developers wanting to develop at very low densities, and development being of insufficient scale.

There is little or no discussion of the role of older areas and properties in facilitating diversity. In terms of retail, housing, recreation and employment, historic buildings can accommodate a range of specialist demands and rental values, allowing uses to be accommodated which may not be viable in new development.

The document should also discuss the impact of a high quality urban environment and historic buildings and areas on the ability of different areas to attract prestigious companies, high value jobs, and high quality investment.

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- 3.1 The IHBC welcomes the steps being taken by English Heritage to investigate ways in which the historic environment can be used to address the requirements of the National Curriculum. It is essential to generate interest in the historic environment, and the wider urban environment, in younger generations. The Hackney Building Exploratory provides an excellent model for built environment education.

Where there are trends towards low-skill/low-paid jobs, training in specialist conservation skills clearly has the potential to provide better opportunities and real economic benefits. There is a need to raise the status of skilled professions. There has been a recent tendency to promote the maximum number of people on to degree courses and in some sectors this has led to a mismatch between educational attainment and the employment requirements of the nation. It is essential to promote skilled professions as a viable and attractive alternative to pure academic achievement.

The document points out some of the trends in the construction industry that have led to a reduction of skills. Design and build projects in particular tend to neglect quality in favour of short term cost cutting. A common characteristic of design and build schemes is poor standards of detail and finish. A major failing of the planning system is its lack of influence over the method of procurement and control of quality during construction, even in sensitive locations. This effectively robs the planning process of a major aspect of quality assurance. There is a need for formal recognition of skilled building professions, and for their use in quality sensitive projects. In addition, national fiscal policy needs to be reviewed to remove the current disincentives to sustainable construction, and replace them with positive incentives.

- 3.2 A major emphasis of SHER should be on research. There is a need to undertake research to fully develop the case for giving conservation a high priority in the formulation of public policy. At present, the social and economic benefits of heritage regeneration are vastly under-appreciated by the Government and many other national and regional bodies and local authorities. Sound empirical evidence is required to help change attitudes.

- 3.3 Further problems that need to be addressed through education are raising awareness of the differences between style and quality, and urban and architectural design. It is also important to challenge more reactionary approaches to conservation. A common problem in new development in historic locations is an assumption that imitation is necessary (regardless of the diverse nature of the historic environment) and a concentration on crude stylistic characteristics rather than any real understanding of architectural principles. Achieving enhancement depends on understanding of context, good neighbourliness towards existing buildings and spaces, and quality of design, detailing, and execution. Clients, professionals, and the interested general public need to be encouraged to develop greater awareness of these ingredients for quality, and how they relate to maintaining and enhancing the historic environment.

One of the reasons that certain minority groups feel excluded from the historic environment is the low priority and status afforded to the recent heritage, especially the heritage of the post-war period.

The failure of English Heritage and other conservation groups to attract people from younger age groups is a matter of serious concern, and a potential threat to the long-term prospects of the historic environment. Positive steps are required to address this problem. Research is urgently required to find out why young people are uninterested in conservation, and what steps could be taken to gain their interest. The education of school age children is likely to be an important aspect of this. Education is important because it raises awareness of what is of value in the built environment, and why. The Hackney Building Exploratory referred to above illustrates how young people's interest in the built environment can be developed, and how people can be empowered to become more involved in decisions affecting their surroundings. In addition, it is necessary to more closely integrate historic environment matters with wider concerns such as urban design, new architectural movements, green concerns, and regeneration. It is necessary to place far

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greater emphasis on recent heritage, such as that relating to contemporary music, sport, etc. The image of the conservation sector may be a problem. Of fundamental importance is to challenge reactionary attitudes, where they exist, in the heritage industry (the view that old is good and new is bad). For example, there are some individuals and organisations that seek to resist modern or non-imitative design as a matter of principle. Such attitudes often arise as a result of a failure to properly understand the historic environment. Many young people use the historic environment, for example Manchester's pub and club scene. Young people can be spurred to take action where their own interests are concerned (for example the campaign to save Quiggins in Liverpool). The need to involve younger people in conservation groups, both local and national, should be afforded a very high priority.

- A1 VAT on building repairs and refurbishment is an anti-quality, anti-sustainability and anti-regeneration tax.
- A2 The drop in the level of grant aid to English Heritage is indicative of the low priority given by the current Government to conservation (see comments above on the need for research, etc).

I trust that these comments are helpful.

Yours faithfully

Dave Chetwyn
Consultations Secretary