

# BARR Questionnaire

IHBCS response August 2022

1.

## **Why do you use the Register and how often?**

*Please summarise your interaction with the Register. If you don't use the Register, tell us why.*

I, Charles Strang, charlesstrang@mac.com, am submitting these comments from the Scottish Branch of the Institute for Historic Building Conservation (IHBC) as its Consultations Secretary.

IHBC Members work in government (local and national), the private sector, and the third sector. We have no figures as to their use of the Register, but they have been supportive of and contributed to the work of the Register and its predecessors as far back as the Historic Buildings Bureau.

We are taking the opportunity, unasked, to respond to this consultation which has been drawn to our notice by BEFS, because we strongly believe that this is an important area of work which should be given greater prominence. As such, we are disappointed that this is not a full public consultation which engages our entire sector, communities of place and communities of interest. Buildings at risk represent important community resources, not least at a time of climate crisis in terms of their embodied energies, and we wish to encourage, across the board, effective actions to encourage reuse.

This is especially important where Listed Buildings are concerned, both for themselves and for the hope that they can give as pathfinders to supporters of buildings of lesser architectural and/or historic values.

IHBC's Scotland Branch is not renowned for actively promoting English practice, but we do recognise (and therefore reflect upon in our consideration of what might be desirable in Scotland) the potential strengths of the scheme by Historic England. This involves HE helping Planning Authorities with the costs of preparing and serving Listed Building Repairs Notices, and with the costs of acquisition where that proves necessary and they cannot otherwise be recouped. Eligible expenses include the cost of acquisition, professional services, and legal advice, taking into account any profit or unavoidable losses when the building is sold on. Similar such support in Scotland would be greatly appreciated by IHBC Members.

2.

## **How could the Register be more proactive?**

*We think the Register could be a more proactive vehicle for enabling the reuse of buildings.*

*Do you consider the Register currently assists and enables the reuse of buildings, and if so, how does it do this?*

*What changes would you suggest to do this more successfully?*

A relentlessly positive tone stressing the advantages of reuse of existing buildings and Listed Buildings in particular.

FAQs would encourage folk to become better informed as well as helping them to feel they are not alone in wishing to take up such challenges.

Links to sources of helpful information, advice and potential support.

Promotion of the idea that it's never too late to consider a scheme of repairs.

Promotion of the idea that good maintenance will prevent buildings falling (further) into disrepair.

The importance of community support, not the least in unlocking potential areas of support including funding.

3.

***What should be included on the Register?***

*Currently the Register contains around 2220 entries for buildings at risk, with another 230 in the process of reuse. This includes 1860 listed and 592 unlisted buildings. We are re-considering the scope of the Register and what could be included so that we can focus our resources where they are needed most.*

*Do you think the Register should focus its work on listed buildings only?*

Yes, the Register should focus on Listed Buildings, otherwise in a world with clearly limited resources, the best will be the enemy of the good. And it will not be possible to assess effectiveness if BARR subjects are not finitely defined.

*What criteria should we use to assess that a building is at risk?*

The existing criteria should be used: substantially empty and requiring in many cases a new owner with a plan.

4.

***Should the Register focus on buildings which can realistically be reused?***

*We are seeking your views on whether we should only include buildings on the Register which are capable of beneficial restoration for new uses.*

No. That requires a judgement call which it is not possible to make responsibly without considerable time and work. probably with more than sprinkles of inspiration and lateral thinking. There are a number of examples, too, where mothballing may gain sufficient time for a new use to appear and be “viable”.

*Do you consider we should prioritise buildings for the Register, and if so, what factors should we take into account?*

Yes. Listed Buildings.

5.

***What do you consider are the main reasons for buildings being at risk in your area, and what are the barriers to Councils taking action?***

*What do you consider are the main reasons buildings are at risk in your area, for example, conservation deficit, development blight, uncooperative/ unknown owners?*

Market values, especially in more rural areas, may not always reflect the community or sustainability benefits to Listed Building retention and re-use. Nevertheless, support should be sought and creative thought given to making projects work. We would like to see far greater recognition of the role that government (local and central) funding can play in promoting such successful projects directly and indirectly, and the gearing that their funding in particular can achieve when appropriately aligned.

Even where Councils have such resources as Conservation Officers, Planning Authority departments have been savagely cut over the past decade and earlier. Their capacity to take forward this type of work is limited and encouragement is required, both financial and in terms of knowledge-base. The BAR toolkit should be more widely known.

Owners and their agents can be fixed in their ideas as well as being unrealistic in terms of their aspirations, financial and otherwise. Again, positive examples of success, as well as a clearer and less obstacle-filled route to compulsory purchase if all else fails, are important.

*What are the main barriers to Councils taking action to address this through powers such as urgent works and repairs notices and Compulsory Purchase Orders? Is staff time or the potential financial burden an issue and if so, what could we do to help?*

Staff time, expertise, and finances are all critical factors, although perhaps the political will is the most crucial and least straightforward. It must be made easier for the process of Planning Authority intervention to happen with minimal risks and maximum benefits. Many Authorities are risk-averse,

and have difficulties with the idea of intervention, even as a last resort, and they need support along the lines of the EH scheme mentioned above. They need a “bullet-proof endgame”.

Community involvement, of place and of interest, will also be vital, and this should also be built in to remedial processes. As things currently stand, community involvement has perforce become merely consultative rather than truly participative, and this can only change for the better if Planning Authorities have the time, skills and resources to achieve it.

6.

***How can we best work together?***

*Is there scope for your Council to assist in assessing local buildings, working together with local community groups and empty homes officers?*

This should be a core activity for Planning Authorities. Without a Conservation Officer this will be more difficult to achieve.

*Is there scope for your Council to take the lead on developing options and briefs for the potential re-use of these buildings?*

The EH scheme would appear to offer a successful route to positive action. Without such a belt and braces approach we are concerned that risk-averse and intervention-shy Planning Authorities will fail to achieve positive outcomes for Buildings at Risk in their patches.

*How could we support you with this?*

We are sure that responses to a wider consultation would be supportive of an approach along EH lines, and along with enhanced capacities (including Conservation Officers) within Planning Authorities would do much to address the needs of Scotland’s Listed Buildings at Risk.

7.

***Finally... do you have any other suggestions?***

IHBC would be happy to comment further to clarify or expand upon any of the above as might be considered necessary or helpful.

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