

DCMS INQUIRY: PROTECTING BUILT HERITAGE

1. The importance of the built heritage in the UK and the barriers to its preservation.

The historic environment is a finite resource integral to the history of the UK, and an important economic asset, both in terms of tourism and by providing an attractive environment in which to live and work. Historic towns present a yardstick for sustainable urban living in which to live, work, and play within a short compass, and where the attractive mixed use historic environment brings visitors from the surrounding area and further afield.

The main threat to the preservation of historic buildings must be largely financial, and though grants used to be available from local authorities, this is seldom the case today. More important buildings may attract HLF (Heritage Lottery Fund) funding, and support from Historic England (HE) may be available; more commonly, however, HE tends to administer Government and/or HLF larger scale initiatives concentrating, for instance, on repairing or reinstating historic shopfronts as part of an initiative for reinvigorating traditional High Streets, and the current Places of Worship Grant Scheme.

Clearly, owners of listed buildings, and other buildings integral to maintaining the character and appearance of conservation areas, should be encouraged to adopt a regime of planned maintenance and repair for their buildings. Mystifyingly, however, successive governments have adhered to a policy of applying the ruling rate of VAT to maintenance and repair, whilst zero rating new development. Effectively a deterrent, therefore, to looking after your property, and a perverse incentive to opt for its demolition and replacement, or least to carry out unnecessary work to qualify as new development for VAT purposes. Furthermore, historic buildings are a repository of embodied energy, and their retention and adaptive reuse, where appropriate, is in keeping with the current preoccupation with net zero, and the longer term acceptance of sustainability objectives set by the Brundtland Convention (1983).

2. Issues with funding and whether current models are suitable and accessible.

Funding of arms-length statutory bodies English Heritage and Historic England should at least be maintained at current levels, and increased whenever possible.

As noted above, HLF activities should be supported, both for individual projects and for strategic initiatives which may be administered by local authorities in collaboration with HE. In an ideal world, of course, grants would once again be available locally for the owners of Grade II listed buildings, but the current parlous state of local authority finances makes this look well nigh impossible. Similarly, grants were available previously from EH for Grades I and II* listed buildings, but it is assumed that this is less likely to occur these days without support from the HLF. In summary, therefore, there are channels for funding which can be accessed, but they are much reduced, and while levels of funding are grossly inadequate, the situation would be much worse without the efforts of the NLF.

3. How the Government can tackle practical and regulatory challenges.

Given the value of the historic environment nationally, as set out in section 1 above, the Government must be firm in its support of the heritage policies set out in the NPPF and carried forward into local plans. In setting current Government growth priorities, Ministers have been vocal in making a scapegoat of the planning system, and by implication the regulatory controls over the built heritage. Experience shows that the use of the terms NIMBY, and, more recently 'blockers', are a useful way of disregarding what may be perfectly legitimate arguments objecting to a particular development proposal. Similarly, the emphasis on speed of decision making may prevent proper consideration of proposals affecting elements of the historic environment. For instance, it takes special architectural expertise to design an appropriate new build insertion into an historic High Street frontage.

4. Availability of skilled practitioners.

Advice on the heritage aspects of planning applications submitted for consideration by local authorities requires access to expert advice from in-house conservation officers, and may also require an input from statutory consultees such as Historic England. Ideally, local authority development management teams should be required to include a properly qualified conservation officer, and this is something that the Government should insist upon. In practice, of course, many councils are without conservation officers and have to rely on planning officers for expert advice which they are not properly qualified to give. Of course, some councils will rely on consultants, but only for major cases: for routine applications

planning officers will have to stand in. On the assumption the parlous state of local authority finances is unlikely to improve for the time being, the Department might consider opening a dialogue with those tasked with putting together planning courses, with a view to inserting a heritage module. This would help to ensure that at least some basic expertise might be available where there was no access to advice from an in house conservation officer.

To illustrate the importance of having experienced conservation officer expertise available, it is worth noting that listed building consent would not be required where the works proposed were not adjudged to affect the special interest of the building.

All too often, listed building consent applications are called for without justification, resulting in an unnecessary recourse to listed building controls.

5. The managed decline of assets on publicly owned land.

Clearly, the best way to arrest the decline of historic buildings is to find a viable use capable of maintaining a programme of planned maintenance and repair. If the buildings themselves are publicly owned, the body concerned has a particular responsibility to find ways of improving the situation, to set an example to their constituents (if local authority owned), and/or to other private owners.

It is a well-known ploy for unscrupulous owners to let a building decay to a point where it becomes irreparable, and then has to be demolished to make way for new development. Given the embodied energy invested in historic buildings, public authorities should avoid such a scenario, and do their best to secure the adaptive re-use of such buildings. Where the publicly owned land on which the historic building is situated is extensive enough to

accommodate a wider development, the renovation and re-use of the building could be made a condition of any permission granted.

6. Policy issues from net zero targets.

As already shown above, sustainability and net zero considerations recognise that the embodied energy invested in historic buildings makes a strong case for their retention.

Historic England Advice Note (HEAN 18) 'Adapting historic buildings for energy and carbon efficiency' (July 2024) contains expert advice on retrofitting historic buildings to meet net zero targets.

7. Importance of built heritage for economic regeneration and community identities.

As indicated above, the historic environment provides a template for sustainable urban living, where people are drawn to live, work, play and visit - all within a relatively short compass. Such areas tend to be attractive, and the pattern of terraces, squares, mansion blocks and traditional retail facades can accommodate relatively high population densities on a human scale, without resort to high rise. A significant component of more important built heritage will also attract tourists, and benefit the local economy.

Character appraisals, placing the built heritage in context, will make for better planning decisions, and will pick out the less prestigious elements, such as locally listed buildings, usually selected in consultation with the public, to build up a picture that the community can relate to.

Particular elements of the built heritage, such as theatres, pubs, town halls and churches, traditionally play an important role as community hubs and cultural assets. In London, for instance, planning policies recognise the role of churches in also providing high quality spaces for musical performances and other cultural activities.

8. How communities can be empowered to manage their local built heritage assets.

The local authority has an important role to play here. In the first place, officers and councillors have to be clear about the importance of the built heritage, and the positive role it can play in the future of the area. As part of the democratic process, engagement with the local community is essential. Civic Societies and local residents groups should be kept in close contact, and responses to consultations be fully considered and acted on appropriately. Too often, consultations are merely procedural window dressing for a decision already taken. Positive support for the built heritage should be made evident through the presence of a conservation officer on the planning team, the availability of expert advice to owners of heritage assets, and the regular release of information on aspects of the history of the area.

In conclusion, there is circumstantial evidence that the best performing councils for dealing positively with all aspects of the historic environment, are those where planning interests are represented at the highest level by a chief officer prepared to advocate on behalf of the historic environment as part of his brief.

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