Submission to APPG on Conservation, Places and People

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I welcome the establishment of this APPG and the opportunity – pointed out by the Heritage Alliance – to respond to its first consultation.

Personal introduction

I am a trustee of the Heritage Trust Network and of the City of Winchester Trust, with a professional background of almost 30 years in the preservation trust movement. However, I write this as an individual, and the views and opinions are my own.

The overarching point

It costs more to repair and reuse an existing building, historic or otherwise, than to build a new one.

A good part of this is due in every case (even churches now) to the imposition of VAT, whereas newbuild is VAT-free. For decades government has said it could not lower or abolish VAT because of EU rules; that excuse has now gone, and government needs to act.

Also often the costs of land remediation mitigate against preservation, especially if the building has an industrial history that might involve contamination. PPP (the Polluter Pays Principle) has been in place since the Rio Declaration in 1992, but has been more honoured in the breach than the observance. I struggle to think of an instance of historic industrial conservation where the polluter has paid, indeed the costs of clean-up are often used to justify the loss of the building – a developer can only afford to clean the site up if the troublesome building of whatever listing grade can be redeveloped at several times the density.

Both these blocks to conservation and regeneration can only be addressed at government level.

Preamble

Preservation Trusts are known as restorers of last resort – HTN members work to rescue buildings, invariably with the aim of contributing to the wellbeing of the wider community and surroundings, that have otherwise slipped through the net. They are, if you like, market failures, whose restoration costs are generally more than the end value of the building, and whose rescue can only be brought about by the combined efforts of numerous bodies and funders. The paradox is that, by the time it is acknowledged that there is no other solution for the building, restoration costs are vastly higher than they would have been if rescue and reuse had been more timely. The point of the trusts and other bodies that emerge to rescue the building is that they are not-for-profit, so can achieve what the commercial sector cannot or will not.

I have just had the task of reviewing a new strategy for the Heritage Trust Network, and suggested removing the term “well-loved” from the part that describes how HTN member organisations work to save heritage buildings. My point is that many of them are not well-

loved, especially those built in the 20th century or – my own area of work – industrial buildings. However fine they once were, by the time they have been redundant and neglected for several years they are loved only by enthusiasts and professionals. All too often local people see them as eyesores and are all too keen to see them demolished. Examples include Preston Bus Station (see below), which has been triumphantly reborn with significant input from a past president of the RIBA, when the local authority had wanted to demolish it for years, and the Grade II* listed leather drying shed in Sawston, South Cambridgeshire, which I tried and failed to save. The parish council and most local residents saw it only as an eyesore, and ultimately in 2018 Historic England was unwilling to support it – although I see to my astonishment that it still appears on HE's Buildings at Risk Register for 2020.

Differences of opinion on the merits of often derelict buildings notwithstanding, HTN has over 200 members across the UK, a handful of individuals but mostly trusts, which alongside the countless civic societies and similar bodies implies considerable support for the historic built environment. It should be said that in many cases that includes the natural landscape or designed landscapes too, often including one or more buildings.

Your specific questions:

What evidence exists of the economic, social and environmental benefits from the conservation, care and regeneration of historic buildings and areas, across the UK?

Historic England has compiled Heritage Counts for about 15 years or more, with the variety of topics increasing in recent years to cover environmental considerations and, last year, social considerations, starting with an examination of societies' changing under the impact of Covid-19. https://historicengland.org.uk/research/heritage-counts/
The Heritage Alliance at the end of last year released a major piece of work looking at Heritage, health and wellbeing. This has a foreword by Nigel Huddlestone, MP Minister for Sport, Tourism and Heritage, who I'm sure you will be interviewing.
https://www.theheritagealliance.org.uk/blog/2020/09/21/heritage-health-and-wellbeing-report-launch/
The Architectural Heritage Fund in their annual reviews give figures for the number of historic buildings they have assisted (through a variety of usually local bodies) and the financial figures involved. http://ahfund.org.uk/publications
The links are here, but I'm sure you will have access to this without my needing to reiterate.

In 2019 the Architects' Journal launched its campaign 'Retrofirst', on the principle that the greenest building is one that already exists, encouraging architects to revamp and reuse existing buildings rather than only being interested in building new ones. That follows the award of the Turner Prize in 2015 to Assemble Architects, for their work in Granby 4 Streets, a very long running preservation battle in Liverpool where entire communities had previously been swept away in the name of market forces.

Various professional journals cover with increasing frequency cases of reuse and regeneration; a recent one is here:

https://www.placemakingresource.com/article/1704252/review-regenerating-industrial-heritage-housing?bulletin=placemakingbulletin&utm_medium=EMAIL&utm_campaign=eNews

%20Bulletin&utm_source=20210114&utm_content=Placemaking%20Weekly%20Bulletin%20(20)::&email_hash=
Apparently there is to be a new tv show on heritage rescue, on the Discovery Channel, filming in August – not many details yet but the call has gone out to trusts etc.

I take this increasing coverage to indicate that the wider world is discovering what the heritage profession has always known, that old places allow people to be rooted and to flourish better than shiny new ones, and that loss of historic built fabric can damage communities and a sense of individual belonging. Certainly the residents of Granby 4 Streets hung on for decades in the face of central planning. Possibly also it's discovering that, occasionally at least, there's money to be made, hopefully not only by tv channels.

How can the conservation and regeneration of historic areas contribute to the wider agendas of governments across the UK to equity and 'levelling up', along with their focus on high streets revival?

It has been the case for most of my professional career that there is no wreck or ruin in London or most of the south east that someone doesn't feel they can profit from since property values are so high. For a preservation trust to acquire a building in these areas it has to be beyond desperate, something really almost unusable like a pier (Hastings, Southsea) or a bombed-out chapel (St George's Woolwich, rescued by Heritage of London Trust Operations). Almost 50 years ago, at the start of the heritage movement, bodies such as the Spitalfields Trust saw the aesthetic and historic value of neglected streets of Georgian houses and were able to acquire them; now, perhaps in part because of their own magnificent work, while there are still historic buildings needing attention they are more likely to be bought by developers for demolition and redevelopment (the repeated attempts by developers to demolish the unlisted General Market at Smithfield).

The situation in parts of the areas needing "levelling up" – i.e. the deindustrialised parts of the country, once thought to be beyond the "red wall" – is still much the same as London and the south east 25-30 years ago. If it worked in Spitalfields there is no reason why it shouldn't work in Hartlepool (which has a magnificent heritage of Georgian houses) or Hull (even older buildings).

The high streets in these areas similarly are suffering more than in the south precisely because the towns and cities are poorer. Covid-19 notwithstanding – no-one can predict the long-term damage there – there is no reason why a revived covered market in Leeds or Newcastle, for example, should not flourish given help. Small traders need inexpensive premises and flexible terms, but a historic setting is a major draw: local people feel an identification with the place while incomers and tourists react with pleasure as they did when Covent Garden was first restored and opened up.

Bishop Auckland provides a remarkable example, where a single philanthropist started by buying the paintings in the bishop's place, then bought the palace and its grounds, then swathes of the historic centre of the town, opening it up and bringing other investment, carrying out sensitive repairs and also installing a streetscape bolder than most local authorities certainly envisaged when he started a few years ago: parking on the periphery, pedestrian priority etc. But although there should be many more millionaires using their money like this, arguably it is no more a solution than philanthropic housing was in the 19th century. Just as those philanthropists realised they could only scratch the surface of need and investment had to come through legislation, so it will need investment and legislation

to persuade/encourage/force demoralised local authorities that have struggled since their industries died to act to preserve and enhance what they have left.

Is there a case for further increasing the level of investment in the heritage and infrastructure of places outside London and the south east of England to assist the 'levelling up' of lagging regional economies?

Unquestionably.

In 2011 it was the intention of George Osborne and the Coalition government to repatriate business rates, i.e. the authority where they were raised could keep them, in exchange for the loss of government support grant. The government support grant has been substantially slashed (up to 40% in places like Liverpool or Blackpool) but local business rates in these areas are nowhere near enough for the proper running of civic society. Repatriation has never been fully implemented, but simply would not work. In order to level up, and just in the interests of fairness, business rates raised in Westminster or Kensington should be redistributed (in the form of a restored government support grant) to what the 2011 consultation paper from CLG called "once-proud cities" now forced to "hold out the begging bowl." The economic and social divide since then has only widened.

It is excellent to think that there might be recognition that heritage and conservation might be invoked to close that gap, but it will need major investment.

It is also necessary, though, to recognise that there are pockets of lagging economy in the south east, and even in London. The seaside resorts come particularly to mind. Investment in Margate has produced the Turner gallery and also, after many years, the restoration of Dreamland (which has the first listed roller-coaster in the country – the second is at Great Yarmouth – see below), which have helped considerably although many inequalities and many neglected historic buildings still remain. But many other places have not had the advantage of artistic input and creativity.

How can regeneration of the historic environment contribute to and interact with efforts to revive local economies in the wake of the Covid-19 pandemic and subsequent recession?

Local authorities are still too fond of new buildings, still proposing new retail and office space. The answer must be to make the most of what is already there, much of which will be of historic worth. The planning system needs to be tilted away from old thinking to thinking about old buildings, but with added Covid-awareness.

An odd example is EasyHotels, a chain that has taken a number of good existing buildings (a textile office and showroom in Newcastle, a shipping warehouse in Manchester) and used good conservation architects to create super-budget hotels which bring people to slightly off-centre parts of the city. However they apparently require that there should be no opening windows. (This seems to apply to other cheap hotel chains building from scratch.) Presumably it's on safety grounds, anticipating rowdy guests prone to take silly risks, but in the Covid era there should be no buildings with windows that cannot be opened. Mechanical ventilation is not enough, and is also more energy-hungry.

It's excellent that major companies want to take historic buildings - Pizza Express used to be another example – but they can't be expected to go beyond the planning legislation in

converting them. So it is the legislation that needs to be strengthened (or adapted for the Covid era).

Another aspect of reuse of existing buildings is that they are generally low enough not to require a lift, except for disabled access, which minimises the risk of time spent with strangers in a confined area. Often ceilings are higher and windows larger, both good for air circulation.

What evidence exists that historic buildings provide flexible, low rental space for start-up businesses, social enterprises and community facilities, thereby helping to stimulate local economies, particularly in more peripheral neighbourhoods?

A very incomplete list:
The Custard Factory in Digbeth, Birmingham
The Coffin Works, Birmingham
The Biscuit Factory in Newcastle
The Tobacco Factory in Bristol
Paintworks in Bristol
Dewars Lane Granary, Berwick upon Tweed
Chance Brothers Glassworks in Smethwick
Drapers' Hall in Coventry

The last two of these are in progress, the others are long-standing successes; many other old industrial buildings provide creative and small business spaces. There are very many more, to be seen in the annual reports of the Architectural Heritage Fund and elsewhere.

Not only conventionally-constructed buildings can be rescued and restored, although 20th century ones generally pose greater problems, and meet greater opposition. A successful example is Preston Bus Station, listed Grade II but proposed for demolition by its own local authority; after a struggle by the 20th Century Society and others it is now an operating bus station again, with a youth centre and new public open space – and the town takes pride in it.

Countless small projects to save buildings in smaller towns and villages create community facilities – many preservation trusts work with community development trusts to deliver everything from yoga studios to nurseries to community shops.

How has heritage regeneration helped to boost the image and social cohesion of the areas they are located in, attracting investment and providing a catalyst for reversing economic decline?

See Dreamland, Margate, above, also Time & Tide in Great Yarmouth (an old, listed Grade II, herring curing works turned museum, that was shortlisted for the Gulbenkian Award Museum of the Year in 2005 and a finalist in the Council of Europe's Museum of the Year Award 2006), and many others.

In 1994 Circus Space (now the National Centre for Circus Arts) took over the buildings of the old Shoreditch Electric Light Station, in a traditionally deprived area of London. This pioneering reuse triggered surrounding regeneration, including that of Shoreditch Town Hall (acquired in 2002 by the eponymous preservation trust), now an arts centre, artist's

studio and award-winning restaurant, and then the magistrates' courts opposite, now a 5* hotel. In this case the reversal could be said to have gone too far, as Hackney is now out of reach for most people who actually study or work in these buildings. It would be wonderful to know how to prevent that, which happens often, particularly in cities.

In Derry the Inner City Trust sees itself as much as a development engine as a preservation trust. With the aim of social and economic renewal it has created and runs the Bishop's Gate Hotel in the old Liberal Club, restored various old factories and shops (and built some new ones), provided bars and restaurants and generally been a powerfull force for improvement. At least partly as a result, international businesses such as Danske Bank and FinTrU have set up in the city, in historic buildings.

How can the care, repair and regeneration of the historic environment help to meet the UK's commitment to sustainable development, including cutting emissions to net zero by avoiding the use and waste of scarce resources associated with demolition and redevelopment?

See various other responses here – the issues are inseparable.

How can conservation-led regeneration of the historic environment help to promote sustainable patterns of development, striking the right balance between economic growth and social equity, while also curbing wasteful emissions?

The very first DCMS publication on the new Heritage Lottery Fund noted that the energy taken to make the bricks in a standard Victorian terrace house would power a car more than ten times around the world. It also noted that demolition and construction was the largest producer of waste in the UK. Fuel efficiency may have improved since then but the point about embodied energy has still not got through to policy makers.

And while the cement industry works to green its image, the embodied energy in, say, the threatened Cardross Seminary in Scotland, or the lost Tricorne in Portsmouth (which could have been saved), is inconceivable. Cement produces about 8% of global CO2.
https://www.carbonbrief.org/qa-why-cement-emissions-matter-for-climate-change

For social equity, the small houses in Nelson, Lancashire, restored by the Heritage Trust for the North West, the Little Houses Improvement Scheme across Scotland, or the vernacular houses restored by HEARTH – the Historic Environmental and Architectural Rehabilitation Trust for Housing – in Northern Ireland have all produced social, environmental and economic benefits, over many years. Great Yarmouth Preservation Trust worked with a housing association to turn buildings dating from the 16th century into social housing and a foyer for young people, and the Worcestershire Preservation Trust is about to do the same with a building of much the same age, Willow Court Farmhouse in Droitwich. In fact it's hard to think of a conservation project that doesn't tick all three boxes.

What are the implications of the government's reforms to the English planning system, proposed in the planning white paper, for the conservation and regeneration of historic areas?

Streamlining and modernising (the aims of the reforms) sound good until you look under the covers.

Since at least 2010 government has wanted to slash 'red tape', seeing any kind of planning legislation as an impediment to economic growth. In fact, as all the research shows, it is interesting and well-restored historic areas that attract tourists and other inward investment (and heritage tourism was estimated to bring in nearly £10bn in heritage-related inbound spending by international visitors for England alone, and £2bn in domestic heritage-related overnight spend in 2018 (figures from CEBR for Historic England)). While some of that will have gone to new galleries and museums like Turner Contemporary or Hepworth Wakefield, or the New Arts Centre Walsall, most will have gone to established locations and institutions, from Stonehenge to the great cathedrals. The setting of these jewels is paramount. If unfettered new development is allowed in historic places, the result will be damaging. Lincoln nearly lost its two historic, listed, Corn Exchanges but happily a redevelopment plan was reversed after public outcry and now they are to be restored as part of a vastly better plan for the area.

It's hard to see that happening under new legislation, which removes almost all meaningful public consultation.

The definition of growth areas is concerning, as one person's eyesore, ripe for redevelopment, is another person's heritage asset. Large areas of cities like Grimsby, with its Grade II* Ice Factory and the remaining Kasbah buildings, and Hull, where important buildings, including listed ones, have a tendency to catch fire, come in this category. Under the white paper planning consent in a growth area is a given.

The imposition of increased housing numbers in many areas is too reminiscent of the disastrous Pathfinder plans of the 1990s, intended to deal with market failure (see Granby 4 Streets, above, and also the Welsh Streets in Liverpool, large area of Manchester, Salford and countless other cities suffering economic hard times). Whole areas were blighted and sound, often 19th century, housing lost on a specious argument for new development that never arrived.

Action on Empty Homes notes that in 9 out of 10 local authorities the number of empty homes has risen between 2019 and 2020. Most areas with the highest percentage of empty homes are still those where Pathfinder was tried and failed, and where the north/south gap looms widest. The total has risen by 42,540 to 268,385 across the UK. It's generally said that the empty homes are in areas where people don't want to be because there is no work, but government promises to level up are surely designed to address this. Imposing new housing on areas with no real need is absurd, and a huge waste of resources (as Pathfinder was previously). This issue should be addressed before new housing numbers are considered.

The same might apply to empty investment properties. Developments such as Nine Elms (based around the poor benighted Battersea Power Station, surely the worst example of enabling development ever) are no longer selling, with the combination of Covid-19 and Brexit. This seems a very unwise time to set in stone 'once in a generation' planning legislation.

The topic of green belts (still to be protected under the new proposals) is too large to tackle here, and not wholly relevant, but it's worth noting that many planning consents are given, usually for large houses, in the green belt already, and that over-zealous protection

of land that could perhaps be intelligently swapped for other parcels will add pressure to many historic cities such as Oxford or York.

It's also worth noting that most professional planning bodies plus the Centre for Sustainable Energy, CPRE, Civic Voice and others all oppose the white paper.

What have been the impacts of cuts in local government to the capacity of planning departments to facilitate the conservation and regeneration of sensitive historic areas?

Devastating. One in three posts has been lost (it may be more now, with lockdown and furlough). Many, even historic, small towns do not employ a properly qualified conservation officer. An unfortunate by-product is that planning and conservation officers made redundant often – understandably – become consultants, and end up advising developers who want to destroy the heritage they once worked to protect. An example is the Strand Union Workhouse in London, where an ex local authority and then ex English Heritage planner made the case for demolition. It's hard to see how this can be avoided.

How can post pandemic efforts to boost skills training support efforts to revive neglected crafts key to historic building conservation?

The heritage conservation sector has been crying out for more and better skills training for as long as I can remember. The Heritage Crafts Association includes brick-making, flint-knapping and leadworking on its endangered list. Historic England comments regularly on the issue. Until the UK government values the hand-made and the technical equally with the academic, the problem will persist.

In pandemic terms, it is interesting to note than many of these trades are open-air, and healthier than learning in an enclosed space.

How can the conservation and restoration of historic parks and other important green spaces contribute to efforts to encourage exercise and thereby promote health and well-being?

This final question should be so obvious as not to need asking (although I agree that it does, because so much funding has been lost from parks etc.)

It's known that gardening and horticulture are valuable in recovery from mental ill-health, which looks like being a post-pandemic epidemic. Bodies such as Thrive work in places from the Chelsea to the Petersfield Physic Gardens. A recent Wellcome Foundation exhibition about Play showed the impact on children's mental well-being of densification. Allotments, many of which have historic significance, are under threat by local authorities for development.

Many Victorian parks were given and laid out precisely to provide fresh air and exercise – and beauty - for the working population. We should not be having to make the argument again over 150 years later.

Conclusion

Government should abolish VAT on repairs and restoration, ideally add it to new housebuilding where developer profits are vast in order to balance the books, recognise the value that most people put on heritage, acknowledge the contribution heritage makes to the economy, accord proper status to expert conservation officers and encourage local authorities to employ them, stop calling sensible regulation ‘red tape’, and preferably rethink the white paper further, in the name not only of heritage protection but cross-national justice.