



MINISTERIAL ADVISORY GROUP
FOR ARCHITECTURE AND THE BUILT
ENVIRONMENT FOR NORTHERN IRELAND

DFC Consultation – Proposals for a Historic Environment

Fund

MAG Response

31 | 5 | 16

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By email to:

historicenvironmentfund@doeni.gov.uk

1.00 General

- 1.01 MAG was established in 2007 to advise the Minister for Culture, Arts and Leisure (and since Departmental reorganisation, the Minister for Communities) on the implementation of the Architecture and Built Environment Policy.
- 1.02 MAG welcomes the opportunity to comment on the proposals for a Historic Environment Fund, and we provide the response below in questionnaire format.

2.00 Questionnaire Response

Q1: Do you agree with the overall approach to the Historic Environment Fund as outlined in section 1?

Yes.

Q1a: Please provide any comments to explain your answer to Q1.

MAG agrees that Northern Ireland's built heritage has great potential to support and sustain vibrant communities and regenerate the economy. The historic environment is a key component of our cultural heritage which has the ability not only to encourage visitors, but also to draw people to want to live and work in established towns and villages. MAG supports the proposal for a Heritage Environment Fund which will act as a catalyst to widen interest in the historic environment.

The approach does cover a wide range of items and it will be important to have a substantial budget in order to realise these items fully. It will be vital to establish and prioritise where funds are most needed that will bring most gain to the community.

Q2: Do you agree or disagree with the proposed four key strands and their associated aims?

Agree.

Q2a: Please provide any comments to explain your answer to Q2.

MAG supports the proposed four key strands of Research, Regeneration, Repair and Revival encompassed within the fund:

Research is vital to maintain ongoing best practice and to record and study Northern Ireland's built heritage and monuments for the benefit of future generations.

Regeneration initiatives can support local communities and enable Heritage Regeneration schemes that can provide ongoing social and economic benefit for those communities. These initiatives should not be confined to Conservation Areas because as a signatory to the European Landscape Convention, this country acknowledges that "all

places matter". MAG has been disturbed by schemes imposed in the name of housing redevelopment or comprehensive development that have ignored the stewardship of places for the many years while these schemes have been progressed, left incomplete or never started, blighting communities, neighbourhoods and urban centres.

Heritage is just as much about the "everyday" as the "special" and by applying these good principles to all regeneration, the Department for Communities has an opportunity to involve many people, both local people and those with special talents and interests to use good stewardship to achieve successful places very quickly. The historic environment includes our street patterns which are often the oldest surviving parts of our places and which need to be documented and respected in regeneration and in new developments, protected as assiduously as other aspects of our heritage.

Repair is the most crucial as it provides visual evidence of the benefits of restoration and acts as a positive example to others of what can be done. It also has the potential to have a beneficial 'knock on' effect on the neighbourhood and sometimes an entire area. Creating incentives for repair will encourage owners to achieve a similar result.

Revival will help raise awareness of the benefits built heritage can bring to local communities and encourage best practice and stewardship of listed buildings.

Q3: *Do you agree or disagree with the proposals to include a framework for the Principles for the sustainable management of the historic environment to include the six identified Principles?*

Yes, MAG agrees.

Q3a: *Please provide any comments to explain your answer to Q3.*

The framework sets out parameters for a full understanding and appreciation of the importance of sustaining the historic environment and best practice in conservation stewardship, defined as active caring that includes maintenance and management. Management alone is not sufficient and references to management in the document should generally be changed to stewardship which implies a caring as well as a managing role. This also connects heritage more closely to

the Strategic Planning Policy Statement and the Supplementary Planning Guidance in Living Places as well as the other work of the Department for Communities in terms of Housing Association registration that requires good stewardship.

Q4: Do you agree or disagree with the percentages of funding allocated for each of the quadrants of the Historic Environment Fund?

MAG agrees with reservation

Q4a: Please provide any comments to explain your answer to Q4.

It is difficult to comment on percentages of funding without knowing what funding is available.

With restricted funding the amounts quoted seem reasonable. It is important to continue research, understanding and raising awareness through education in order to secure a future for the regeneration and stewardship of the built environment. However, bearing in mind that repair is undoubtedly the most fundamental aspect of sustaining built heritage, the percentage spent on this should increase with an increased budget.

Q5: Do you agree or disagree with the proposed list of proposed funding streams under the outcomes of a Heritage Research funding stream?

Yes, MAG agrees, but it is important to share this research, particularly through a good website presence and through notifications to subscribers when new material becomes available. The Strategic Design Group is working on a means to provide access to material relevant to Living Places in the first instance and ensuring connection with the already well managed website run by PLACE. Ensuring good links between websites of these types is an essential part of communicating the availability of relevant and up to date material.

Q5a: *Please provide any comments to explain your answer to Q5.*

It will be important that research carried out through funding from HED is widely disseminated so that its findings can be shared not only to secure the future of listed buildings but also those buildings beside listed buildings, in Conservation Areas and Areas of Townscape Character and indeed the wider built environment which has value that is often under-recognised, as noted above. There is a disparity in approach that these equally important aspects of built heritage are controlled and enforced by District Councils, not HED. These councils will need to work with HED to ensure a co-ordinated approach for the benefit of towns and the historic environment as a whole.

Q6: *Do you agree or disagree with the proposed list of proposed funding streams under the outcomes of a Heritage Regeneration funding stream?*

Yes, MAG agrees.

Q6a: *Please provide any comments to explain your answer to Q6.*

Encouraging participation and engagement with local communities and communities of interest will raise awareness of the social and potential economic benefits of heritage regeneration. This funding stream is targeted at the Heritage at Risk Register which lists some of Northern Ireland's most vulnerable listed buildings. MAG agrees it is crucial that the aim should be to eliminate this register entirely by upgrading and renovating the properties on it wherever possible. Funding should therefore only be given to building stock already on the HAR register in order to discourage owners or even councils from letting buildings deteriorate in order to attain funding.

Q7: *Do you agree or disagree with the proposed list of proposed funding streams under the outcomes of a Heritage Repair funding stream?*

Yes, MAG agrees with reservation.

Q7a: Please provide any comments to explain your answer to Q7.

MAG believes it is a very positive step to encourage owners of listed buildings to repair and maintain their heritage assets, thereby sustaining heritage skills and enabling greater public appreciation of the historic environment.

MAG supports the proposed funding streams, particularly the new proposals for thatched buildings and listed B1 and B2 churches. Many churches suffer from lack of maintenance and would benefit greatly by repairing leaking rainwater goods. MAG believes that each application for funding towards repair should be looked at holistically and not as a 'tick box' exercise. Some buildings for example, may need urgent repair to rainwater goods or stonework but will not meet the criteria listed.

There is benefit in pro-actively encouraging collaboration which would greatly reduce the cost to individual owners. For example, HED could arrange with Councils for an annual "gutter clean" along a street, using the same equipment that is used for street lighting repairs, or putting up the Christmas decorations, for example, and thereby reducing the cost dramatically for each owner when compared to having to hire access equipment for a single building. Allocating some of the fund towards such communal schemes would be a highly valuable use of resources and could include an agreement with councils and owners to share the much reduced cost. The allocation of resources should depend on practical outcomes (such as are provided during MAG Ward Visions and civic stewardship) that actually have results on the ground and do not just produce more papers.

Conservation work to historic buildings necessitates the appointment of experienced professionals to plan, advise and undertake supervision of appropriate work. The proposals recognise that conservation work requires extra cost and that poorly specified or badly executed work can be damaging to character and difficult to rectify.

In order to encourage good practice MAG therefore believes that the department should advocate good practice by assisting with fees associated with the appointment of conservation professionals. This is fundamental to ensure work is carried out appropriately. Proposals for repair should be approved before any grant is given to ensure quality.

Q8: *Do you agree or disagree with the proposed list of proposed funding streams under the outcomes a Heritage Revival funding stream?*

Yes, MAG agrees.

Q8a: *Please provide any comments to explain your answer to Q8.*

MAG is supportive of the proposals that will help promote our shared historic environment to a wider audience. It would be good to include outreach outside Northern Ireland to increase awareness of our heritage assets. There is potential for example, to tie in with initiatives in the Republic of Ireland such as the creation of Northern 'Heritage Towns' that can be visited or included in tours of Ireland. MAG has been discussing a Civic Stewardship (active caring for people and places) Award with colleagues in DfI who are part of the Strategic Design Group and it would be good to associate heritage awards with the proposed civic stewardship awards. This would help to integrate heritage where it belongs in the mainstream and not be seen as a special and discrete area of activity.

Q9: *Do you agree or disagree with the proposed restrictions to the fund-retention of capping, processing, batching and prioritisation aligned to financial forecasting?*

Yes, MAG agrees with reservation.

Q9a: *Please provide any comments to explain your answer to Q9 with regard to retention and level of capping; processing, batching of applications and prioritisation aligned to financial forecasting.*

MAG understands that funding needs to be capped in order to ensure funds are distributed as widely as possible. However it will be important to ensure continuity of funding so that larger schemes are not abandoned part way through and the benefit of repair already undertaken lost to the community. A great deal of work and financial planning goes into applying for and securing grants and it is vital this work is not lost or made irrelevant due to changes in policy, thereby further risking heritage.

Q10: Do you agree or disagree with the proposal to request details of other sources of recent funding from applicants to avoid 'cold spots' of funding?

Yes, MAG agrees.

Q10a: Please provide any comments to explain your answer to Q10.

Applicants need to be transparent regarding other sources of funding to ensure maximum dispersal and avoid disproportionate funding.

Q11: Do you agree or disagree with the proposal to prioritise the four categories above in the event of restricted funding?

No, MAG disagrees.

Q11a: Please provide any comments to explain your answer to Q11.

MAG believes that each application for funding towards repair to a listed building should be looked at holistically on a case by case basis, and not as a 'tick box' exercise. Some important town centre buildings for example, may need urgent repair to rainwater goods or stonework but will not meet the criteria listed, with funds perhaps being diverted to a remote thatched cottage. Whilst important and in decline, such a building might not necessarily deliver the ongoing community benefit a restored town centre building might offer. Listed buildings with owners in receipt of state benefit do not automatically own the buildings that would benefit most from repair so should not be prioritised. As the only Northern Ireland building on the 'Structures on the World Monuments at Risk Register' is Carlisle Memorial Church this reference should be omitted.

Q12: Do you agree or disagree with the proposal to require proof of temporary measures to be undertaken to address water ingress for the owners of buildings on the HAR register?

No, MAG disagrees.

Q12a: Please provide any comments to explain your answer to Q12.

This requirement assumes that all buildings on the HAR register have problems with water ingress. Addressing water ingress should certainly be encouraged but requiring measures to be undertaken will be onerous for some owners and relevant administration difficult for the department to implement. The nature and quality of measures may well be impossible to prove.

Q13: Do you agree or disagree with the proposal to fund maintenance plans?

MAG does not agree with this as proposed.

Q13a: Please provide any comments to explain your answer to Q13.

MAG agrees that an appropriate maintenance plan should be submitted as a mandatory condition of any offer. Such a document would naturally be part of the appointed consultant architect's work and be undertaken well into their appointment, once the building has been surveyed, the renovation approach has been established and repair measures costed. The amount offered of £200 is an unrealistic approximation of the total cost incurred and focuses irrationally on one aspect of conservation work. MAG believes the department should instead offer assistance with the appointment of allied design professionals where necessary in order to encourage appropriate work and advocate good practice.

Q14: Do you agree or disagree with the proposal to retain the enhanced level of grant aid for owners in receipt of qualifying benefit and the proposed level of capping?

No, MAG does not agree.

Q14a: Please provide any comments to explain your answer to Q14.

Listed buildings with owners in receipt of state benefit do not automatically own the buildings that would benefit most from repair so should not be prioritised. Such applications should be approached on a case by case basis and offers made commensurate with the potential community gain to be achieved through funding repair. The level of capping should be in line with other recipients of funding as proposed.

Q15: Do you agree or disagree with the proposal to continue to exclude Government and public bodies, Housing Associations funded by public monies and large commercial organisations, including but not exclusively limited to, financial institutions and multi-national companies?

Yes, MAG agrees.

Q15a: Please provide any comments to explain your answer to Q15.

These institutions have their own funding streams.

Q16: Do you agree or disagree with the proposal to include a claw back clause for the repayment of the funding in the event of the failure of a scheme to progress through acquisition funding or in the event of sale of a building funded through an enhanced scheme [90% funding]?

Yes, MAG agrees.

Q16a: Please provide any comments to explain your answer to Q16.

This proposal will eliminate the potential for private individuals to profit by selling buildings that have benefitted from publically funded renovation and repair. However implementation will cause huge issues and be very difficult to manage successfully. It is impossible to say what percentage of a purchase price should be repaid – or indeed what percentage of a grant. A building being sold to a new owner may be the best thing that ever happened to it – assuming that the

new owner has the resources to care for it. A clawback could make a sale impractical or not worthwhile for the vendor.

Q17: Do you agree or disagree with the proposal to continue to fund Condition Reports and Forward Plans?

Yes, MAG agrees with reservation.

Q17a: Please provide any comments to explain your answer to Q17.

Condition reports and forward plans are an important to enable owners of listed buildings to prioritise and programme proposed work. Funding should be made available for all condition reports and forward plans as these are a necessary stage of work for most proposals for listed buildings.

Q18: Do you agree or disagree with the proposal to requirement the appointment of accredited conservation professionals on funding schemes over value of £10K?

No, MAG does not agree.

Q18a: Please provide any comments to explain your answer to Q18.

Experienced professionals may not necessarily be accredited and accredited consultants may not have significant conservation experience. This restriction will greatly reduce the choice of professionals eligible and adversely impact cost of the work. Works to listed buildings will sometimes be a very small part of a larger new build project or renovation.

MAG would suggest that recognised professional qualifications should be sufficient, particularly for smaller projects, or for projects where the listed building element is a very small part of the overall project. Rather than a one size fits all approach, larger schemes could insist on the appointment of suitability experienced professionals. MAG believes the department should offer assistance with the appointment of experienced consultant architects, surveyors, landscape architects

and engineers where necessary in order to encourage appropriate work and advocate good practice.

Whilst the intention to support appointment of accredited conservation professionals is laudable in theory MAG feels this proposal will have an adverse effect to that which is intended. Almost all proposals for repair to listed buildings will cost in excess of £10,000 including VAT and consultant fees. Owners will be deterred from appointing experienced consultants as the grant offered may well be less than the cost of the appointment. Smaller repairs therefore, such as to windows, will likely be undertaken without funding or the supervision of any professional. The scheme value where such appointments are required should be raised significantly to avoid this.

Q19: Do you agree or disagree with the proposal to require all recipients of suitable offers will be required to agree to an appropriate level of public access for 5 years from the date of the final payment?

No, MAG does not agree.

Q19a: Please provide any comments to explain your answer to Q19.

This should be commensurate with the scale of the building and nature of the work carried out. It is not realistic to expect owners of private properties to allow public access for 5 years in return for what may well be a small grant. It may well be appropriate however for publically owned buildings.

Q20: Do you agree or disagree with the proposal to require all recipients of suitable offers to facilitate publicity of award of funding including description of proposals, photographs and information including financial award[s]. All to be available for web dissemination and / or printed promotional literature?

Yes, MAG agrees with reservation.

Q20a: Please provide any comments to explain your answer to Q20.

This should be commensurate with the scale of the building and nature of the work carried out.

Nicola Waddington

MAG Member, MAG Heritage Subgroup Chair

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