

Jennifer Storrie
Historic Environment Grants: Consultation
Room 2.6, Historic Scotland
Longmore House
Salisbury Place
Edinburgh, EH9 1SH

28 October 2004

Dear Jennifer Storrie

HISTORIC ENVIRONMENT GRANTS CONSULTATION BEFS RESPONSE

Thank you for consulting the Built Environment Forum Scotland on the proposals outlined in Historic Scotland's consultation on Historic Environment Grants. As you probably know, the Built Environment Forum Scotland (BEFS) is a forum for professional and voluntary non-governmental bodies that work with the built environment. BEFS currently has twenty-two members. In response to receiving the consultation and as noted in the covering letter, BEFS held a workshop on the consultation to gather views from its members on its content – this took place in Edinburgh on 3 September and was attended by 21 people. The notes from the workshop were circulated to attendees and member representatives to inform the consultation process within member bodies. This response is supported by those Members listed below, and draws on the views put forward at the workshop and comments received separately.

General Comments

SCOPE: It is understood that the funding of archaeological sites and monuments has been intentionally left out of the proposed scheme of Historic Environment Grants. There is some concern over this; if a new generic funding power for the historic environment is to be created, then archaeological sites and monuments (key elements of the historic environment) should be included within this funding framework. Likewise, the funding of gardens and designed landscapes (again key elements of the historic environment) does not feature within the consultation document. Both should be included under the banner of Historic Environment Grants – which would concur with the unifying theme established in the document.

LACK OF FUNDING: A very strong message coming through in the course of workshop discussion, and subsequently, is that there is a fundamental lack of funding for Scotland's historic environment. That Historic Scotland must determine a new system to prioritise funding applications; the quantity and complexity of the demand for funding being such that the current system is overwhelmed; is indicative of the fact that the historic environment is desperately in need of greater funding. Historic Scotland's repair grants are enormously oversubscribed, and

accordingly, Government commitments toward achieving better living environments, social justice, economic and community regeneration, are being compromised.

While it is logical that the various elements of the historic environment are accommodated within one funding scheme, it is stressed that this should not detrimentally affect existing funding levels of the various elements which are already insufficiently low.

1 Do you agree with our proposals for the adoption of strategic priorities for the programme of Historic Environment Grants?

The members of BEFS appreciate the need for Historic Scotland to establish a new means of prioritising grant applications; within the current context this is very necessary given the heavy level of demand for grants over supply. However, taking the broader perspective, prioritisation in this way would be less necessary if overall funding levels for the historic environment are increased.

In general, the new priorities are supported, however their implementation will have to be considered very carefully to ensure that funding the protection and conservation of the historic environment remains a top priority, over and above the new strategic priorities described in the document. Key concerns are highlighted as follows:

- The requirement to meet additional priorities may mean that very important buildings, that may be less able to meet additional priorities, would score less highly than others within the same batch, and lose out as a result.
- In the same context, the pressure to prioritise by determining the importance of an asset and the value of a project, may cause smaller elements of significance eg elements of a designed landscape, to be overlooked.
- Private owners might fare even less well (than is already the case) in meeting new priorities as they may be less equipped to provide training, community benefit etc.
- In general the fulfillment of additional priorities will vary according to the nature of the project eg scale of project and resources of applicant. A system of making decisions against the proposed priorities would have to take such variances into account.
- The additional priorities are largely subjective – much more clarification will be required on how priorities are to be assessed.
- There is also concern over the extent to which funds would be diverted to enable projects to meet the additional priorities, and whether this would be at the expense of repair/conservation work. Given that the fulfillment of additional priorities would add value to projects, there could be scope for receiving additional Scottish Executive funding to meet this added value.
- There is continued concern that the funding of maintenance is not being adequately addressed. Such funding prevents further decay and is ultimately more cost effective. The priority placed on A-listed buildings at risk will do little to prevent further decay of other buildings in need of repair work.
- A key step would be the obtaining of fiscal relief for repair and maintenance work. BEFS Members are supportive of legislative amendment that will permit a meaningful reduction in VAT chargeable on maintenance and repair work.

Such concerns reinforce the conclusion that the priority of protecting and conserving the historic environment should take precedence over others. This might be achieved through a system of weighted scoring, with heritage merit taking priority. A further factor to note is that the success of an application will depend upon the other applications in the current batch for determination; see below.

2 Do you support the establishment of an Historic Environment Regeneration Fund?

It is understood that this proposal aims to increase the focus on area regeneration by consolidating the funding currently available to conservation areas. Further clarity is required on how this fund will be implemented, for example how will historic areas be identified? What criteria will be used? How will assessments be made? Care should be taken not to neglect important areas that have *not* been subject of a conservation area appraisal and more likely to be missed.

3 Do you support these proposals for making the system of historic building repair grants work better?

Regarding the proposal to introduce a system of batching; given the concerns noted above, the fact that an application may be considered in up to three batches is welcomed. It is understood that an application may come back again, even when it has been through the batching system three times and not achieved funding, in circumstances where the nature of the project has changed. Clarification is required on this so that applicants understand what constitutes a 'new' project.

The dynamic nature of a batching system means that applicants must be kept informed of the progress of their application and, in cases of refusal, the reasons for this. BEFS members would encourage Historic Scotland to adopt an ongoing dialogue with applicants in this system, particularly in cases where the provision of additional information might help the decision-making process.

Some concern has been expressed over the lack of independent advice in assessing applications; this is seen as important given the aim to increase transparency. It is however appreciated that an independent advisory body would slow down the process of decision-making. It might be that an independent panel could deal with the applications that Historic Scotland is minded to refuse.

A couple of points regarding timescales;

- It is noted that the requirement to finalise an account on a building contract within 2 months is unfeasible.
- It is noted that the system of granting consent to 'start work without prejudice' works well, as it gives greater flexibility.

4 Do you support these proposals for legislative change?

It is understood that the proposed legislative changes would be inevitable within the context of the current proposals. It should be noted that there is some concern over the loss of the term 'outstanding' – as described under paragraphs 40-41, as in reality the term does carry something of an accolade value and loss of the term may have unforeseen impacts.

All proposals for legislative change should go before the HEACS working group that is reviewing the heritage protection legislation in Scotland.

I hope that these comments are useful – please get in touch if you would like any further information or clarification on these points. The Members are keen to input further into deliberations over the detail of the proposed scheme – please let us know the outcome of this consultation and the next steps in due course.

Yours sincerely

Jo Robertson
Administrator

This response is supported by the following members of BEFS:

Architectural Heritage Society of Scotland
Association of Preservation Trusts - Scottish Committee
Council for Scottish Archaeology
Garden History Society in Scotland
Heritage Futures, Glasgow Caledonian University
Institute of Field Archaeologists – Scottish Group
The National Trust for Scotland
Royal Incorporation of Architects in Scotland
Rural Scotland
Scottish Civic Trust
Society of Antiquaries of Scotland