

DCMS Consultation: English Heritage New Model (see [Consultation Document](#))



Comments by The City of Winchester Trust

The Trust is relatively happy with the proposals in the consultation document, which certainly have merit in rationalising the present accumulated legislation. However, we have four comments in answer to questions, which we hope might have some influence on the final legislation, with particular emphasis on the answer to question 12, which is based both on statistical and local evidence.

Question 1 – We agree with the proposed benefits, but are concerned that the number of buildings and sites within the EH collection that have the potential to make money as visitor attractions, may not be enough to support the upkeep of those that do not. £80M seems like a generous fund, but the £52M element available for work on the structures will be needed to make up the considerable backlog of work that has occurred due to the repeated cuts in the EH budget for many years. Once this has been spent it is essential that the position is reviewed. It is important to bear in mind that buildings once put into good repair, deteriorate slowly at first but with increasing rapidity if not properly maintained until, within 50 years or so, they are once more at risk. So on both counts there should be an acknowledgement that this change does not relieve the government of responsibility for the nation's built heritage.

Question 3 – We suggest that the creation of this new and important charity might provide an opportunity for association with others (the National Trust, the Royal Palaces, and so forth) for their mutual support and for the enhancement of public interest in historic buildings.

Question 11 – There are Heritage Assets that are not in the care of any organisation and although they may now have better protection in planning terms, some have owners that either cannot or will not fund them adequately. Compulsory Purchase is an ultimate safeguard, but Local Authorities are extremely reluctant to exercise this power because they are not geared to handle such matters. If the new charity were empowered with government approval and support to become the recipient of properties acquired by compulsory purchase, to put them in good order and where appropriate to sell them on, it

should provide Local Authorities with confidence to use this measure of last resort.

Question 12 – We are very concerned indeed that the secondary legislation related to the role of the new Historic England passes on important responsibilities in connection with Listed Buildings to the Local Planning Authorities without ensuring that they are able to fulfill these responsibilities. Continuing research by EH and the IHBC shows a progressive deterioration in the resources of Local Authorities to meet even their present obligations. Between 2006 and 2012, the numbers of conservation staff fell by 25% overall and 31% of those qualified to give building conservation advice. Development Control and Strategic Planning staff are not qualified or in any way equipped to handle the complex issues of conservation that require not only training but experience to provide the necessary expertise.

There is a tendency for central government to hand down obligations to local government without the necessary funding and guidance, or measures to monitor the results of its delegation. We therefore urge in the strongest possible terms that government investigates this problem before implementing the legislation, and takes steps to ensure that one way or another Local Authorities are able to fulfill their historic buildings responsibilities and do so effectively. We are fortunate in Winchester district that the Council now maintains a good conservation team, but there are Councils locally that have no full time conservation officers, and many in the country that have no conservation staff at all. If at this time it is not possible to ensure that there is sufficient qualified in-house staff, Local Authorities should be obliged to consult conservation accredited independent experts.

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