

APPENDIX 2

Respondent Information Form

Response by Belfast City Council to the consultation on proposed changes to listed building funding and administration

Historic Buildings – Grants

PP1. Do you agree with the proposal to extend grant-aid to the B2 category for secular buildings? If not, please explain.

Belfast City Council strongly supports the extension of grant support to all categories of listed buildings, as it believes that the historic built environment is key to a number of issues relating to quality of life, citizens secure and confident in their identities, economic regeneration and minimizing growth in carbon emissions.

PP2. The proposal is that a single rate of 35% grant-aid on eligible costs would be beneficial to assisting with the cost of the repair and maintenance of listed properties. Is this rate appropriate? If not, please explain

35% is probably an appropriate rate of support to incentivise maintenance. In the case of major work required to save or stabilize a listed building this level of grant will probably not be sufficient to enable less-well-off owners to carry out the work. It is felt that the total amount of money available is not sufficiently large to cope with likely demand, particularly in the early years after the changes, given the ratio of B2 to other categories of listing. £500,000 is not a large sum in the context of overall public expenditure, or indeed the budget of the relevant department.

PP3. The proposal is that all professional agents or designers engaged on grant applications should be suitably qualified and/or experienced as defined by EHS, or an independent professional selection body. Do you agree? If not, please explain.

In this context ‘professional agent’ seems an unusual term to use and may raise expectations that payments could be made for the service of preparing grant applications. The detail of qualification/experience by the EHS is crucial and two other issues also appear likely to impact on the effectiveness of the initiative: that the overall quantity of expertise available locally is currently inadequate; that there is a danger the hurried import of external experts may give rise to inappropriate practice in the local context – for example English thatchers working with reed may both prefer this material and lack

specific skills to work with straw. The problem could appear at all levels, from architects down, and we suggest that a gradual introduction of the measure might be necessary.

PP4. The proposal is that works resulting in the removal of any original character will not be grant aided. Please provide comments.

Belfast City Council strongly supports this measure and believe that it sits well with the investment it has made in identifying and promoting cultural quarters in the City. 'Original character' requires careful definition, however, in that the character of building does not merely relate to those features in place at the time of its original construction.

PP5. Do you agree with the principle of extending grant-aid to preventative maintenance works in future years? If not, please explain.

This is an essential and cost effective measure. The City Council urges that the principle should be extended to prioritise stabilization measures, in whatever form. The transferability of lessons gained from trials with an organization with huge capacity and experience of the National Trust might be examined.

PP6. Do you agree that the existing grant policy relating to thatch work should remain unchanged? If not, what are your proposals?

Whilst not immediately relevant to the Belfast area, the principles behind both the preservation of thatched roofs and the associated skills needed to roof with local materials, rather than imported reed, are supported by Belfast City Council .

PP7. Do you agree that the following elements / components should be grant eligible? For example:- Organs, in churches, etc.

The City Council thinks it inappropriate to fund organ conservation as part of architectural preservation, certainly beyond the visible external elements. Work to preserve the internal workings is disproportionately expensive in terms of benefit to building preservation and character.

Setting elements, such as cobbled courtyards.

Belfast City Council supports this, and urges particular attention to the preservation of original surfaces as well as to wider contexts, which need sensitive handling, controlled through planning mechanisms.

Clocks, in bell towers, cupolas, etc.

Belfast City Council supports the conservation of original clocks still in situ. This should not necessarily extend to the full restoration to working condition, or grant aid for replacement clocks, though a good argument can be made for replacing clock faces if these are missing.

Other elements within the curtilage of a Listed Building.

Belfast City Council feels this raises the issue of what should be included within listing. It might be a more transparent and consistent approach to grant-aid only what is listed, and hence protected, but additionally include a wider range of elements in listings. This again raises the problematic issue of 'original character'.

PP8. Should a condition of grant-aid be to provide access to the building on particular occasions, for example public access could be made available on two European Heritage Open days in a five year period?

There is a well-established practice involving tax exemptions for material culture, which are held on a central database. The Council is strongly in favour of public access being a condition of grant aid. Making all possible sites available on a single day, such as European Heritage Open Day, does not seem to be the best way forward. We suggest access on a specified number of days, for example ten, but by appointment only. The Council also believes that it has led by example on this issue in terms of working towards maximizing access to its own stock of historic properties when possible.

PP9. Do you agree that the existing grant policy relating to eligible individuals should remain unaltered? If not, what are your proposals?

It would appear likely that in many cases persons in receipt of means-tested benefits could not afford even 10% of major repairs. One way forward might be to give 100% support for this work, but recoup 65% (100% - 35%) on sale or transfer, including inheritance.

PP10. The proposal is that the existing grant policy relating to ecclesiastical buildings should remain unchanged.

If you disagree, what are your proposals?

Should 'Ecclesiastical Exemption' be reconsidered with regard to grant-aid?

Should grant-aid for listed churches be offered with conditions, as stated in alternative ii?

Should grant-aid be made available to all listed churches? This may impact on available grant-aid budget.

Belfast City Council feels that there is limited continuing justification for ecclesiastical exemption especially as there have been some egregious examples of interference with important structures in the past enabled by the exemption.

On that basis, it seems logical to remove any distinction between churches and secular buildings (i.e. under new proposals, all grades eligible for 35% grant) and that ecclesiastical structures compete for support against other applications.

PP11. Are the above proposals, to provide funding to Building Preservation Trusts, appropriate?

Belfast City Council believes that Building Preservations Trusts have made a valuable and substantial contribution to the sustainability of the historic environment and welcomes support which will enable them to continue and increase this role.

The assumption is made that £500,000 per annum will be a specific N. Ireland allocation within the overall Architectural Heritage Fund pot. This should be allocated by the same criteria as the general fund, but informed by the relative local importance of the building.

PP12. £500K represents a significant proportion of the Historic Buildings grant-aid budget. (a) Is this figure appropriate, and (b) is a revolving fund structure appropriate?

Belfast City Council suggests that a distinction needs to be made between annual expendable grant-in-aid and the capital sums offered as loans. As the capital is essentially recoverable and £500k represents only a fraction of many building projects, we suggest that it could be substantially increased in the initial stages of these changes. The revolving fund model is an excellent one.

PP13. *Is this the most appropriate method of providing funding?*

As the best way of deriving value from the public purse, both in financial and wider terms, the Council urges that BPTs should be able to retain 'profit' made on projects up to generous limits, provided this is expended on further preservation projects within a certain period.

PP14. *What are your views on a third party, specifically AHF, managing this funding for EHS?*

The Architectural Heritage Fund has a high level of appropriate experience and it has the potential to deliver capacity additional to that already within the EHS.

PP15. *Are the above conditions for an offer for funding appropriate? Are there any other conditions you believe should be included?*

The detail provided in this document makes it difficult to comment meaningfully on the grant conditions. In particular, £125,000 is a substantial sum in revenue funding, but less significant in capital loan terms. The exact manner in which 'gainshare' is applied could have significant impact.