

Guidance on Alterations to Listed Buildings (PPG 15—Annex C)

by

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The Planning Policy Guidance note, *Planning and the Historic Environment* (PPG 15), was published in 1994 under the joint auspices of the Department of the Environment and the Department of National Heritage. It is the most recent statement of central government's policy, so far as it concerns listed buildings and conservation areas. The PPG has various annexes: Annex C is entitled 'Guidance on Alterations to Listed Buildings'. While the text of the main PPG was written by professional civil servants in the two government departments involved, Annex C was written by English Heritage staff, after wide consultation with local planning authorities and other interested parties. It would be tedious to detail all the stages of the document's evolution, but the final text is of some historical interest, both as a summary of conservation concerns of the mid-1990s and also because it reflects internal debates within English Heritage and the development of policy within that organisation.

Quite a lot of the material contained in Annex C was first published in Appendix IV of Circular 26/77 under the heading 'Technical Digest on Alterations to Listed Buildings', with the subtext: 'To assist local authorities in deciding on the suitability of alterations to listed buildings the following guidelines have been compiled by the Investigators of the Department [of the Environment], who have extensive experience of alteration work'. Those concerned were the then Chief Investigator Anthony Dale assisted by Martin Robertson, Martin Meade and Brian Anthony; in compiling the text they doubtless drew on the Investigators' Handbook originally compiled by John Summerson as well as their own experience, so perhaps Summerson should also be credited. The term 'investigators' is significant; all those involved had been employed principally in the compilation of the statutory lists and the text reflects their natural preoccupation with features and unusual

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building types. There was presumably some input from the Inspectors of Historic Buildings and Ancient Monuments and from the architects employed by the Historic Buildings Council on grant-aided repair works, but despite its title the Technical Digest is not a very technical document.

The advice contained in Appendix IV of 23/77 remained unchanged in its successor, Circular 8/87, apart from minor amendments in the wake of the 1985 Building Regulations. English Heritage was three years old in 1987 but apparently had neither the will nor perhaps the opportunity to change the text. By the time preparations began for the new PPG, the face of conservation and especially listed building control had changed considerably. In the local planning authorities conservation staff were much more articulate and informed than they had been in 1977, largely thanks to the formation in 1980 of the Association of Conservation Officers. Within English Heritage the Conservation Group, dealing with both listed building control and the grant-aided repair programmes and conservation area work, had become more cohesive and policies more articulate. No doubt this was partly a result of the imposition of casework response targets. Management pressure was for a quick answer and the old luxury approach of 'every case must be decided on its own merits' was too cumbersome.

In a first revision the text of the old Technical Digest was much enlarged by the inclusion of many more entries on individual building types. In fact the revision coincided with a shift of emphasis in listing buildings from a topographical to a typological appraisal. Although this first draft was approved within English Heritage, the Department of the Environment in particular did not want the PPG to be a long document and suggested that an elaborate appendix would be best as a separate document. It was generally agreed that such separation would be a disaster and would lessen the status of advice not contained in the main document.

At this stage I was given the job of revision. My brief was to shorten the text dramatically while retaining as much as possible of the existing wording for continuity. Obviously (though not explicitly) the new text should also take account of policy documents already published and other developments in areas like conservation technology and architectural history. Shortening was achieved in one brutal stroke by omitting building type analysis altogether, the main justification being that the list of distinct building types is constantly lengthening as building history develops. In its stead was placed a general exhortation to recognise and respond to typical characteristics. Otherwise a very large amount of the old text was retained and often could not be bettered, but in taking account of developments since 1987 the emphasis of the previous technical advice was greatly changed.

When 8/87 was issued, English Heritage was still something of a muddle of disparate parts and functions with no clearly-stated and commonly-held views about listed building control. In its previous incarnation as part of the DoE the organisation had been primarily an adviser to ministers, hiding behind the need for impartiality much as Cadw still does in Wales. Freed from the DoE by the 1983 National Heritage Act and stimulated by a steadily increasing flow of casework in all areas - listed building control, building repair, conservation areas, scheduled ancient monuments

and latterly historic landscapes - such views began to emerge.

Several distinct components can be identified. The first might be called the 'archaeological'—a recognition that the historical value of a building lies as much in its original function, fabric and construction as in its design, appearance or associations. Of course English Heritage has a large archaeological component, though the ideological separation between Ancient Monuments and Historic Buildings has been and is still marked. I have no doubt that the absorption in 1986 of the Greater London Council's Historic Buildings Division was important here. The Division had a long tradition of combining structural analysis with documentary research and using the findings to inform listed building control. The continuing survey, recording and research work of the Royal Commission on the Historical Monuments of England, until recently co-located with English Heritage in London, continues to underline the importance of understanding a building's past development and the threatened buildings surveys of RCHME often proved vital in evaluating proposals for works. Outside the 'establishment', the Council for British Archaeology and more recently the Institute of Field Archaeologists have emphasised the importance of recording as a means to understanding, while at the Bartlett School of Architecture the postgraduate M.Sc. course on Modern Architectural History has stimulated the study of buildings by function.

The second component might be called the 'architectural' and can be traced to the influence of the architects within the Conservation Group of English Heritage, some of whom had worked for the Historic Buildings Council before English Heritage was established. Their work—approving or not approving specifications, consulting on-site with conservation architects in private practice, interpreting advice from in-house experts like John Ashurst—had particular significance because it influenced the direction of English Heritage grant spending. A number of these architects had been SPAB scholars or held SPAB principles and these principles were articulated by Christopher Brereton, the chief architect of the Conservation Group, in his book *Principles of Repair* which was published in 1991, only four years before the PPG.

There has always been some tension between the architects and the Inspectors of Historic Buildings who are mostly architectural historians; the one group supervising work, the other advising local authorities and the DoE on applications for listed building consent. In 1991 the Conservation Group was re-organised into regional teams on a Noah's Ark basis, with one Inspector of Historic Buildings, one Architect, one Archaeologist and one Historic Areas Professional for each region. One welcome result was a greater sharing of knowledge and views by professional officers in the same team; another less expected result was that the struggle by the various professions to retain their identities brought policy issues to the surface for debate and these debates certainly informed the new PPG.

I think that there can be no doubt that Annex C is a more sophisticated document than Appendix IV. Whereas the latter is mainly concerned with 'features', the former also picks up on planform, construction and materials and emphasises the need for an informed assessment of what a building is, or was, and how it evolved

before work starts.

What is Annex C and who is it for? Clearly it is not a Technical Digest and clearly not a definitive summary of anything (it is far shorter than Historic Scotland's *Memorandum of Guidance*). It seems to me that the document is:

- 1) a reminder of some of the basic tenets or principles of conservation practice as understood inside English Heritage;
- 2) a quarry for useful phrases;
- 3) an attempt to give guidance on problems which have shown themselves to be knotty, in a language which is plain enough to be understood by all.

It would be tedious to point out all the differences between Appendix IV and Annex C, especially since many alterations consist merely of the re-positioning of existing text, but there are some significant changes and some which are a direct response to particular issues.

The first section, now as before entitled 'General Principles', does for the first time attempt to give some generalised guidance on the proper approach to evaluating and altering historic buildings. The main message here is that the character, historical evolution and the structure of a building should be understood and that speculative reconstruction should be avoided. The excellent paragraph on extensions from 23/77 is brought in wholesale.

Paragraphs 8 to 26 cover external elevations and timber frames. The influence of SPAB thinking about the 'rightness' of lime-based mortar and renders is evident; there is no mention of the composition of these things in the previous circulars. The grim paragraph on external cleaning reflects the many disasters spawned by English Architectural Heritage Year in 1975 and by subsequent Government-sponsored clean-up programmes: façades wrecked by corrosive chemical agents, sandstone smoothed-out to nullity by blasting, timberwork rotted after thoughtless saturation. Cleaning is an aesthetic issue as well, especially when the work is done piecemeal in a formal terrace, for example.

The introduction to the section on roofs brings together remarks on appearance and structure which were separated in the circulars. Paragraph 28 makes a sad acknowledgement that one side-effect of listed building control has been to encourage the stripping of unlisted roofs, a practice stimulated by the dearth of sources for natural roofing materials. The enlarged paragraph on thatch reflects the fierce battle still being fought especially in the East Midlands, between those who favour the use of the local long-straw thatch and the thatching trade who mostly want to use Norfolk Reed with its neater edges and allegedly longer life. The extended advice on the insertion of dormer windows is at least less muddled than that of the circulars.

The main thrust of the section on windows follows 8/87, but two areas show the stamp of English Heritage. Paragraph 42 on re-windowing is the direct outcome of a vicious internal debate over re-windowing in Bath. Should English Heritage grant-aid the re-instatement of small-paned sashes where the existing large-paned sashes were perfectly sound and had been in place for 150 years? The debate was not resolved and the text allows both options! The material on replacement windows is

not wholly new but the text is informed by the prolonged 'Framing Opinions' campaign still being waged by English Heritage against plastic windows.

The greater length of the section on shop fronts is the only direct reflection within the document of the increasing concern within English Heritage for the character of conservation areas. The previous text dealt only with appearances. The new text at least acknowledges the inner-city problem of ram-raiders and attempts to suggest appropriate protection, though it was drafted too early to take on board the most modern solution of surveillance cameras.

Although the section on interiors has fewer paragraphs than before the alterations, this section contains much important new material. The first lines stress the importance of the actual plan of a building (which was not even mentioned in 8/87). The second paragraph underlines the importance of internal walls, which are a principal component of the plan; the third paragraph stresses the value of old plain plaster and standard cornice decoration as well as elaborate forms. The whole thrust of the text encourages a proper evaluation of interiors and preservation of even modest characteristic features. The impact of this advice could be considerable; hitherto many planning authorities have been relaxed about such things as the removal of old plaster but this is clearly at odds with the archaeological line of the PPG. Similar difficulties could follow from the paragraph on interior paintwork and decoration. Historic paint is a new area of research where there are few experts but many consultants with entrenched opinions. Listed Building control over change to some historic interiors may well be appropriate but few have the authority to police it. The cautious tone of the PPG reflects this difficulty and follows a serious dispute between English Heritage and the National Trust over whether consent should be sought for the re-decoration of A La Ronde in Devon.

The wholly new section on floors is equally important. Neglected in the circulars, floors are a major component of historic buildings. Their surfaces may be ornamental, their structures often of considerable archaeological interest, and they often hold the building together. The plea to value old plain flooring ties in with the reference to old plain plaster or old plain glass. The paragraph on floor strengthening is a long-overdue response to thousands of destructive office conversions where office floor loadings were used as an excuse to replace old floors completely. Published research by English Heritage and the engineering firm of Alan Baxter & Associates underpins the argument that most floors in historic buildings are perfectly adequate for their actual loads.

The last section deals with services and underlines just how many excrescences can now be found on the external surface of buildings - satellite dishes, external meter boxes, burglar alarms, floodlights, video cameras - and how much trunking, piping and wiring has to go inside.

Of course there are omissions. With the advent of the Disability Discrimination Act it might have been helpful to supplement the single paragraph on this subject in the main text of the PPG. The removal of all specific advice on building types prevented comment on the control of alterations to churches and chapels. With the partial removal of the Ecclesiastical Exemption this now sometimes falls to the

local planning authority. Some helpful words about the knottiest problems, such as how to deal with galleried interiors full of fixed seating, would have been useful. Both disabled access and church alterations are already spawning literature and will doubtless figure in the next PPG.

So far PPG 15 and its annex seem to have found favour; the first because it gives a surprisingly strong central government commitment to conservation, the second because it builds on the previous advice in a way which is intended to support and sustain conservation officers. Unless the long-awaited backlash against 'restrictive' conservation advice materialises (as it has now in Wales thanks to the former Welsh Secretary, John Redwood) it seems fair to hope that the document will be as durable as the circulars.