

A Report

"The Built Environment and its Conservation".

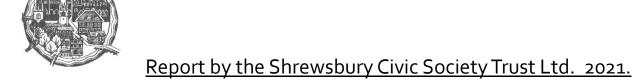
Shrewsbury

This report identifies a concern that has been growing for some years.

May 2021

(updated in February 2022 following some new evidence and suggestions from Shropshire Council's Senior Conservation Officer)

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"Concern for the Built Environment and its Conservation".

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1 Summary of main points:

- 1.1 The Shrewsbury Civic Society Trust Ltd., (SCS) has as its main objective "the preservation, development and improvement of.... Shrewsbury's architectural and natural heritage". (Annex 2 has brief details of some of the actions it has taken.)
- 1.2 SCS values the generally amicable and helpful relationships it has with a number of officers of the Shropshire Council (SC) and other organisations.
- 1.3 Some SC departments appear to give little priority to the County's heritage assets. Shrewsbury's Big Town Plan (BTP) did not recognise heritage originally.
- 1.4 Not enough is done to maintain and enhance Shrewsbury's architectural assets, Listed or otherwise, old or modern. The BTP lacks direct plans for this.
- 1.5 Strategies and protocols to celebrate and benefit from the built heritage have lacked impact.
- 1.6 Current policies to protect and enhance the future of Shrewsbury's built and natural environment are unlikely to have more impact.
- 1.7 Local people have comparatively few opportunities to collaborate and contribute to, decisions and developments concerning the built environment.
- 1.8 A number of minor changes could lead to significant improvements.

2 Introduction

- 2.1 From its 1963 beginnings, Shrewsbury Civic Society's (SCS) main concern has been the Town's built environment. (Annex 2 outlines some of the contributions that the Civic Society has sought to make.) That concern has been slowly increasing and potential changes to the planning system nationally are also threatening. We are worried that the actual priority given to heritage assets (designated and otherwise), both by some owners including Shropshire Council (SC), has been reducing. We have noticed the impact often it is a lack of care and maintenance resulting in unkempt buildings that undermine the town's image. This appears to be due to weak strategic planning for heritage as well as funding.
- 2.2 SCS recognises the initiatives that Shropshire Council has made, including some which are beyond statutory requirements, eg a Developers' Accreditation Scheme, a Buildings Awards Scheme, creating (replacement) officer roles for; Conservation Buildings Engineer, for Tourism and Culture and for enforcement backlog (but no more specifically for Heritage). A cross-departmental "Heritage Asset Management Group" of officers is designed to deal with the maintenance of Council owned heritage properties but it does not have access to ear-marked funding nor include local Councillor representation. However, these measures have yet to not be fully effective.
- 2.3 Both private and public sectors have struggled to finance the upkeep of historic buildings well enough. There has been a dearth of Conservation Grants, (although some limited national aid has become available recently). Well before the pandemic, Shrewsbury had several buildings in prime positions, which were in poor upkeep. They impair the town's good looks and even reduce commerce. (eg Some Wyle Cop traders talk of them as 'long-standing eye-sores that put shoppers off'.) It appears that Shropshire Council's risk-averse legal department hesitates to approve enforcement action. Currently, repairs to any heritage Council-owned property have to compete for funding, eg, with essential repairs to a care home. As a landlord, SC is self-insuring, so any major heritage repairs are often in a long queue for finance.
- 2.4 In marketing pitches for investors, official Shrewsbury advocates have hardly mentioned Shrewsbury's key attraction its beautiful and genuine, historic streets and buildings. These usually make the town a destination for tourists and for investors as well as providing a high quality of life and work environment.

 Marketing has not been closely targeted to those that would be most attracted. External experts recognise Shrewsbury's "heritage offer" is the foundation of its long-term tourist income and should be carefully maximised to take advantage of its genuine historical and architectural assets.

3. Examples of experts' valuation of Shrewsbury's built heritage:

- 3.1 A number of influential and respected "place professionals" have discussed their admiration for Shrewsbury's unusually genuine streets and buildings. Eg Lloyd Grossman, Griff Rhys-Jones and Sir Neil Cossons, who describes Shrewsbury as one of the remaining handful of genuine, largely unspoilt, English towns.
- 3.2 Shrewsbury has been frequently praised in a number of national evaluations from tourism and other advisers. A recent one was The Daily Mail's David Atkinson (7th February 2021), when he described some key architectural attractions of Shrewsbury alongside its history of Darwin.
- 3.3 Early reports of the Big Town Plan (BTP) did not discuss the considerable attraction of Shrewsbury's buildings and streets. However, a more recent Masterplan contains a Heritage Evaluation. As yet, planning lacks the details which this evaluation would affect. Emphasising the need for Conservation-aware plans, experts at the 2021 BTP On-line Festival webinars made points such as:

Bill Grimsey said that "LAs are the custodians of Place...the curation of Place is the most important thing and must be collaborative."

Prof Mark Barrow said Shrewsbury "must build on our character."

<u>David Gillam</u> talked of Shrewsbury Town Centre's "charm", "distinctive uniqueness", and a need for a "heritage trail".

<u>Prof Tim Jenkins</u> said "Shrewsbury has an absolutely unique heritage", "the town is like an open-air museum", "There's a huge opportunity to utilise heritage"

<u>David Milner</u> said "the Heritage premium is X4 in London (currently)." "Repurpose adaptable buildings... beauty matters."

Many other experts (too numerous to mention here) contributed to the BTP Festival events, telling of their high valuation of the town's built environment.

(NB A full set of notes from all 7 webinars is available from the Society)

Later BTP documents suggest a welcome recognition of the importance of Shrewsbury's heritage to the town's sustainability and long-term economy.

4 Examples of others' valuation and opportunities

4.1 Shrewsbury Civic Society's first Statement to the BTP in 2017, said that the town's development should start with its existing main attraction – the unique buildings and streets. Expert opinions support this. Whilst recognising the severe financial and other problems, the Society regrets that heritage has not been highly enough valued by parts of the Local Authority and that this has led to some erosion of the high-quality environment. (eg poor buildings upkeep, some inappropriate planning permissions, slow enforcements, insensitive highways surface replacements, etc.)

4.2 Opportunities to promote Shrewsbury's heritage have been missed. Historic buildings have been seen as a problem or extra expense. However, they are a major asset and visitor attraction for Shrewsbury. They increase footfall and attract historical and architectural tourism. Furthermore, they can attract the sort of investors for whom quality matters. Most importantly, the feel-good factors for residents, elevate the town and support its growth. Frequently, we are told of missed opportunities such as the interest in Darwin and in architectural heritage (some of which Historic England may soon offer at the Flaxmill).

5 Reasons and Results

- 5.1 There are several ways in which Shropshire Council and others appear to under-value the built and natural heritage environment.
 - 5.1.1 Shrewsbury has a number of examples of Council-owned (or freeheld) but poorly maintained historic buildings, which include: The Stew (See Annex 3), Rowley's House, Old St Chads, Welsh Bridge, etc. (NB. Current repairs to Bear Steps are a very welcome exception.)
 - There are also many examples of unkempt privately-owned buildings, where there has been little or no maintenance by the owners. For example; The Glen Maltings, "Parveen", 8, Abbey Foregate. These buildings can spoil the efforts of neighbouring buildings or streets. SC's Conservation Dept., provides advice and occasional restrictions through Article 4, and maintenance enforcement is becoming less rare.
- 5.2 The policies and procedures employed by the Planning Authority favour a "carrots before sticks" approach to controlling development and building quality. This follows Government guidance but has not been effective enough. For example, a voluntary Accreditation Scheme for developers of town-fringe estates has not been taken up. New policy entries to the revised Local Plan do not add the specificity and robustness needed to ensure distinctive high-quality plans. It is also unlikely they will they meet the Government's impending requirements. Although there are good exceptions, many 'volume' builders' new housing lacks distinctiveness and hardly provides for long-term sustainability in all the three NPPF meanings of this, especially with growing home-working needs.
- 5.3 There has been a loss of staff numbers and expertise in SC's departments concerning the built environment. Here, the need for better national Government funding has been obvious, despite the planning department's money-making activities. However, with heritage towns and rare countryside, Shropshire has specific needs, unlike some LAs. Without experienced expertise from well-qualified conservation architects, decisions concerning appropriateness and sustainability are likely to remain unfounded.

- 5.4 The work of Shrewsbury Business Improvement District (BID) has tried to support the retail and hospitality sectors, even in these most difficult of pandemic periods. There have been efforts to market the town for its 'unique' history and high-quality heritage but these are somewhat swamped by the predominant promotion of a "vibrant visitable" town to bring back commerce. It would appear that a relatively low value is given by many town businesses to Shrewsbury's rare built environment, which will and has, provided its most enduring long-term attractiveness. "Building back" must include promoting change that will endure and enhance the town's heritage offer and not undermine its authenticity.
- 5.5 After several years of discussions, Shrewsbury's Big Town Plan (BTP) documents (see 3.3 above) now include "heritage" as a theme. Historic buildings can be more expensive to maintain and retro-fit, but they provide a ready high-quality environment that attracts many sectors (especially media and creative industries) and contributes to long-term viability. However, any initiatives of the BTP will be subject to the LPA's planning responsibilities and any Council-owned buildings involved are subject to owner-obligations. Consequently, Shropshire Council 's LPA and Maintenance Departments should act independently of any BTP or other aspirations.

6 Current Relevance

- 6.1 Concerns are increasingly pronounced as a number of planning determinations, processes and relaxations to help re-generation, are exposing a low level of valuation for heritage. This is sometimes due to what is not done or said rather than what is, and often by private owners. Re-generation initiatives following the Pandemic and increased internet shopping, must surely use, and not even slightly erode, the town's long-term genuine attractions.
- 6.2 This would be a good time for initiatives to be taken to alleviate the undervaluation of heritage, because of: new elected members; changes in the planning system (eg Design Codes); the implications of Shrewsbury's Big Town Plan; and the changes to work patterns and retail space requirements. Additionally, there are national and regional changes with possible amendments to planning and funding arrangements. Shropshire must stand up for or lose its advantages.
- 6.3 To attract visitors and investors the town needs to show it is concerned to maintain its "world class historic assets and buildings..." (Shrewsbury Vision Regeneration 2011 Para 1.1) and "The enormous wealth of historic buildings and other heritage assets within the town should be the key to its regeneration...." (SCS 2017 to BTP.)
- 6.4 Shrewsbury's architectural offer includes good examples of buildings from eleven centuries. While the town is famed for its historic buildings, there are also examples of fine modern ones, which an informed eye may recognise.

eg The Shirehall, Lloyds Bank, Manser's (pet hospital). What high quality architects capture is the appropriateness of the mix in context. With many changes to planning processes pending, this is a good time for local organisations and Authorities to state and elevate their concern for the whole built environment.

6.5 Climate change and the commitment of both Councils to reduce CO2 must be the most prominent factor in considering planning and building alterations now. The Carbon costs of demolitions, new buildings and roads are extremely high. Consequently, huge efforts are essential to avoid these. Retro-fitting for low carbon living and the sensitive re-designing of old buildings for new uses is already being successful. The more recent widening of Permitted Development Rights (PDR) has the potential to find new uses for old buildings, some of which have heritage significance. Here, very high quality redesigning and planning oversight are needed, despite the relaxation in the need for planning permission.

7 Some Possible Actions:

- 7.1 The evidence (and our beliefs) show that Shrewsbury is special, largely because of its built heritage, (suggested by the very high number of Listed buildings and a very large Conservation Area.) This attracts tourists, shoppers and investors. (See 4.2) So the town's future rests on the preservation and enhancement of these features, which should be seen as major assets.
- 7.2 There are immediate and impending pressures for changes that could erode the high-quality of Shrewsbury's environment. Without a higher valuation by the public and private sectors, it is likely that the town's key attractions will remain on a slow downward path of neglect or inappropriate innovation. The following suggestions could tip the balance towards more heritage-friendly private and Council owners and a more sustainable future for the town (and the County).

Recommendations:

- 7.2.1 Any marketing/promotion of Shrewsbury, for tourism or investment, should include an enthusiastic evaluation of Shrewsbury's high quality, built environment and heritage. (Town Council and SC, BTP, BID, Tourist groups.)
- 7.2.2 Shrewsbury's Place Plan should include a specific Heritage Preservation Category with democratic and community consultation and entries coordinated by SC's new "Heritage Asset Management Group". Part of SC Estates Maintenance Fund should be ear-marked for the Council's heritage buildings. (When self-insured such a policy seems essential.) (A category of Heritage Protection may also be appropriate for the Place Plans of other significant historic County towns, without Neighbourhood Plans.)
- 7.2.3 Other strategies, such as: a 'Heritage Buildings Preservation Trust'; a
 Local Design Panel; a nominated Heritage Czar/Champion; Heritage
 Trails; Architectural Festival; FE and HE courses, could all be put in place
 with community and/or business collaborations. (Most need initial SC support.)
- 7.2.4 The details of materials, street furniture and etc., proposed in Highways Contracts for Conservation Areas should be carefully checked by Conservation officers, with local representation, for the appropriateness for that street, prior to commencement. (cf Annex 5)
- 7.2.5 The Local Planning Authority should employ at least one high-quality Conservation Architect and rebalance some officer time to enable action to improve the built environment. (Additionally, more expertise and time will be essential for drafting Design Codes, soon to be required by Government.)
- 7.2.6 Shropshire Council's 2021 Statement of Community Involvement (SCI) would be more effective if it included <u>facilities</u> to enable earlier collaborations with local people and more democratic planning determinations. (SCS suggests re-visiting this policy in the light of new national trends.)
- 7.3 The suggestions above are modest with relatively small financial implications. It is thought the costs of not taking such actions could be much greater for future generations. Shropshire tourism relies on the quality of its environment. The suggestions above seek to deliver improved institutional attitudes (public and private) and help Authorities and others to be more instrumental in Shrewsbury's sustainable future. They should supplement existing actions and seek more benefits.
- 7.4 They are suggested to be compatible with the likely changes from impending legislation and local factors such as the Big Town Plan. The upkeep and enhancement of Shrewsbury's unique built environment rests on SC's and

- other owners' determinations. We think that the suggestions above will help Shrewsbury develop as an advanced, historic, high-quality town.
- 7.5 There are some additional suggestions by which Shrewsbury's built environment could be protected and developed, for example:
 - extending the Conservation Area(s) to give some added protection to parts such as Porthill Gardens and Preston Street (covering Shirehall);
 - updating Conservation Area Character Appraisals;
 - identifying a number of currently undesignated heritage assets, within the wider Shrewsbury, which might be considered for Listing;
 - raising public awareness of issues, eg Conservation Areas, Article 14, Listing, Community Assets, new Permitted Development Rights, etc.

The above examples may be best provided as public/private initiatives. While playing its part, SCS may want to add further suggestions, particularly in the light of changing legislation. (eg re: PDRs, shopfronts, etc.)

Drafted by Mike Carter. Adopted by SCS Council of Management 6.05.21 Chairman: Mike Dineen

Annex 1

How the evidence for the main points appears. Why we are raising these concerns.

The points below are reflected in the summarised numbered points in Para 1.

- 1. The Civic Society's Articles of Association, provide a clear focus for its activity. The objects for which the Shrewsbury Civic Society Trust Limited is established, are: "To preserve for the benefit of the townspeople of Shrewsbury in the County of Salop, and to stimulate and encourage public interest in the preservation, development and improvement of, whatever of the English historical, architectural, constructional or natural heritage may exist in Shrewsbury and its surroundings." (Annex 2 has examples of the Trust's efforts.)
- 2. The Society values the generally amicable and helpful relationships is has with several Local Authority Departments as well as other organisations such as the Town Council, BID and UCS. This report has been reviewed by a senior officer and updates made as a consequence. These relationships have helped information sharing and sometimes enabled the Civic Society to offer active help. (eg Civic Day, Special Character Appraisal, UCS students, BID + BTP consultations.)
- 3. Shropshire Council (as an institution) and some others appear to have a low valuation of heritage assets, as Shrewsbury's BTP did originally.
 - What is not said by senior advocates in promotional events.
 - The structure of the Council's hierarchy gives priority to gaining external investment.
 - The lack of promotional material to attract interest in the 'unique' built environment.
 - Several significant C20th buildings are undervalued and enjoy little or no protection eg Shirehall, Monkmoor Hangers.
 - LPA evaluations of some planning applications suggest a weak consideration of heritage. Eg The Stew, Princess House, St Austin Friars original plans.
 - Despite Shropshire's many Conservation Areas, no Conservation architect is employed.
 - Many assume a tacit understanding of heritage. This does not translate to action.
 - The economic value of heritage and the built environment is ignored (or gets scant mention) in strategy documents, eg Economic SWOT, LEP regeneration docs., etc.
- 4. Not enough is done to maintain and enhance Shrewsbury's built heritage of assets and the Big Town Plan lacks practical strategies.
 - Several of Shropshire Council's own buildings of heritage significance are not well maintained. Examples are: Old St Chads; The Stew (see Annex 3); Rowley's House; The Ark.
 - Repairs are often delayed even when pressing, eg The Hive, Bear Steps.
 - A number of private buildings fall into poor repair and Council efforts to encourage basic maintenance have been ineffective, eg Parveen, 8 Abbey Foregate, The Maltings, etc
 - The Big Town Plan has not included economic strategies to preserve or benefit from historic buildings.
 - Some businesses do much to enhance their historic premises, (eg Henry Tudor House) while others do little, or actually harm the street (such as some inappropriate shopfronts)

- 5. Strategies and protocols to celebrate and benefit from the built heritage are weak.
 - There is no specific conservation champion to protect heritage buildings and advise on the appropriateness of design.
 - There is no specific funding for repairs to the Councils' own heritage assets.
 - No contractual obligations exist to ensure that alterations to street surfaces in CAs by Highways (WSP) (eg SITP) are done sympathetically. (Annex 5)
 - Enforcement actions to ensure proper maintenance have been few and often very belated. eq Parveen.
 - The BTP suggests no active means to "embrace the town's local character" or "celebrate the heritage".
 - Many townspeople are saddened by the poor state (even pre-Pandemic) of some buildings as these suggest an image of weak 'husbanding' for investors.
- 6. Current policies to protect and enhance the future of Shrewsbury's built and natural assets are weak and unlikely to be effective.
 - Planning strategies within the Local Plan (eg a "Shropshire Test" and WMCA Design Charter) are very general and so open to misinterpretation (examples of this already exist)
 - SPD's have previously been unused and provided little rigour in elevating design proposals.
 - The Conservation Department is understaffed and sometimes undervalued.
 - Few new estates have been approved with distinctive, high-quality, sustainable design.
 - Plans to support the management of historic buildings, such as re-instituting a Historic Buildings Preservation Trust have stalled.
 - The 2022 draft Shropshire Plan has little that would initiate or lead responsible stewardship of Shrewsbury's
- 7. Local people have limited opportunities to collaborate with, and contribute to, decisions and developments concerning the built environment.
 - The new draft SCI discusses forward looking principles but provides very few means to realise them.
 - The Community Engagement Team was disbanded in favour of some Place Plan Managers.
 - The Democratic Services Dept have restricted officers' opportunities to engage with the community on controversial issues.
 - Cornovii and other Council submitted planning applications (eg NWRR) are not seen to be subject to independent determination.
 - The Council has reduced the means of democratic representation in planning matters. Eg Fewer planning committees, a very high proportion of delegated determinations, no vote for the relevant local councillor.
 - Enforcement actions concerning Planning Conditions are too late to act on valid local residents' complaints, eg Weir Hill.

Annex 2

Shrewsbury Civic Society has sought to protect and improve the built environment.

Over recent years the Civic Society has sought to improve the town in several ways. It regularly reviews planning applications and comments where needed. It discusses planning issues with planners and Conservation officers, eg about buildings in poor repair. It has contributed to consultations on the Local Plan, the SCI and other policies. It suggested proposals to make the town more pedestrian friendly. It supported the Council's Conservation Department by collecting field-work data to update a Character Appraisal for the Conservation Area. It was instrumental in starting Shrewsbury Growing Forward group. It runs a Buildings' Award Scheme for Shrewsbury and keeps lists of Buildings of Concern and of non-designated Heritage Assets. Members offered considerations at most of the Big Town Plan Master-planning events. The Society keeps its 200 or so members and others up-to-date about local and national planning issues through regular newsletters, a website and Forum meetings. It is funded only through memberships, including a number of Corporate members. It is non-party-political and has procedures to avoid bias from any members' vested interests. Committee members have both relevant professional expertise from the construction/property sector and historical and other interests to offer. It runs a commercial art gallery and small shop.

Previous work has included handing back the Bear Steps complex to the then Council, following a complete renovation. The Society worked to help the restoration of the Old House, the Fellmongers Hall and to re-erect the String of Horses at Avoncroft Museum of Buildings. It played a significant part in saving the Stew from demolition and continues to raise concerns about historic buildings in need of conservation. It has promoted Heritage Open Days and the national Civic Day. It is an active member of the national Civic Voice and has played a part in national policy consultations and Westminster APPG meetings. It has a substantial archive of materials concerning Shrewsbury's built environment, which is being digitised, and it often answers queries from the public.

The Society has had a number of successes as well as less active periods over its 60, or so, years. It is keen to improve its impact and to support the whole town's development, maintaining the high-quality environment.

Annex 3

The Stew (Frankwell Quay) has a history which exemplifies many of the issues in 1.3 to 1.6

Shropshire Council inherited a difficult situation from SABC when this building had already been left unused for a number of years, from 2004, when it was let to a developer. For some two decades it has not been maintained (certainly not to the Conditions required of the tenancy). A Fol request to Shropshire Council revealed "no records" as to why maintenance had not been enforced either through the Conditions of the lease, or by the impact its condition was having on the Conservation Area. Policies of encouragement did not work. The Planning Authority was, however, effective in stopping it being demolished at an Appeal, when the SCS acted as a supporting 3rd party. Following this, SCS's application for Listing was rejected by Historic England. Nevertheless, SC did not enforce maintenance schedules, despite the building's proven age and historical importance. The most recent planning application (2017) was permitted then positively promoted by senior officers, against architectural expertise and Historic England's preferences (although HE accepted the plan if SC found no other way to give the building a future). Other viable plans were offered but not accepted by the owner and SC. Nothing happened for some time and in early 2022, much of the building was demolished in line with the permitted application.

It is generally accepted that the Stew is the only remaining building of significance to the early growth of Shrewsbury as a River port. The building is based on a fine Queen Anne/early Georgian merchant's house and is on a site of earlier importance. SABC sold it Leasehold rather than the Freehold so that it could "maintain control over its use and condition" in such a prominent position. The current application as permitted will provide mixed use but a dominance over (and above) the heritage of the Stew.

The Civic Society has an extensive dossier of the Stew's planning history.

The Stew saga shows the Council's low valuation of heritage potential. Council strategies to encourage maintenance proved ineffective. There was insufficient use of high-quality architectural expertise in the Council's dealings with proposals for the building. Consequently, the building exemplifies points 1.3, 1.4, 1.5, 1.6, outlined in the summary of this Report.

Annex 4.

Note concerning Highways contracts

SITP contract work within Shrewsbury's Conservation Area has been the source of some public concern. The detailed design of the work, ie the materials, street furniture, etc., are very important to the public amenity and to the context of Shrewsbury's historic buildings and streets, within the Conservation Area. This work has not had the benefit of expert Conservation judgement and consequently some of Shrewsbury's originality has been unnecessarily eroded. Nor has the detail had democratic accountability.

While the overall SITP project proposals had a reasonable level of public and democratic consultation, the details and changes (for example, to details of materials) did not. Shrewsbury's medieval look has been eroded.

While some degree of consultation is now said to take place with Conservation officers, the outcome has been that some of Shrewsbury's historic streets now have new but inappropriate surfaces that erode their historic nature.

A simple clause included in all future contracts could prompt detailed consultation with relevant Conservation Department's expertise, prior to decisions about the actual specifications of works in Conservation Areas. (See 7.2.4)