

Shrewsbury Civic Society Trust Ltd.

<u>A Report</u>

"The Built Environment and its Conservation".

Shrewsbury

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

May 2021

Shrewsbury Civic Society Trust Ltd. The Bear Steps St Alkmund's Place Shrewsbury SY1 1UJ 01743 344994



<u>Report by the Shrewsbury Civic Society Trust Ltd.</u> 2021. <u>*Concern for the Built Environment and its Conservation".</u>

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

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1 <u>Summary of main points:</u>

- 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, as did Shrewsbury's Big Town Plan (BTP).
- 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.

(Annex 1 cites the evidence for the above statements)

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 Developers' Accreditation Scheme, Buildings Awards Scheme, creating (replacement) officer roles for; Conservation Buildings Engineer and for Tourism and Culture,(but no longer for Heritage). A recently formed "Heritage Asset Management Group" of officers is designed to deal with the maintenance of Council owned heritage properties but it does not include local Councillor representation or have access to earmarked funding. However, these measures have not been effective enough.

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 - perhaps because several of the Authority's own buildings are left in poor repair. Currently, repairs to any heritage Council-owned property have to compete for funding, eg, with essential repairs to a care home. We understand that, as landlord, SC is self-insuring and so major heritage repairs need to compete 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. This is in spite of the fact that these usually make the town a destination for tourists and investors. External visiting experts recognise Shrewsbury's "heritage offer" is the foundation of its long-term tourist income and should be maximised.

2 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, this is changing. From the recent BTP Festival online webinars;

<u>Bill Grimsey</u> 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)

The latest BTP documents suggest an emerging and welcome recognition of the importance of Shrewsbury's heritage to the town's sustainability and long-term economy.

<u>4 Examples of others' valuation and opportunities</u>

4.1 Shrewsbury Civic Society's first Statement to the Big Town Plan in 2017, said that the town's development should start with its existing main attraction – the unique buildings and streets. Many experts' opinions support this position. The Society regrets that it has not been shared by parts of the Local Authority and has led to some erosion of the high-quality environment. (eg poor buildings upkeep, some inappropriate planning permissions, slow enforcements, 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, increasing footfall as well as attracting 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. Early versions of the Big Town Plan made no mention of this advantage which gives the town a competitive edge.

Frequently, we are told of missed opportunities such as the interest in Darwin and in architectural heritage t (which HE may soon offer at the Flaxmill). BTP now recognises the importance of heritage for Shrewsbury, belatedly commissioning an HER and adding it to a recent master-planning report.

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.)
- 5.1.2 There are also many examples of unkempt privately-owned buildings, where there has been little or no maintenance. These include: for example; The Glen Maltings, "Parveen", 8, Abbey Foregate. While SC's Conservation Dept., provides advice and occasional restrictions through Article 4, maintenance enforcement is extremely rare.

5.2 The policies and procedures employed by the Planning Authority favour a "carrots before sticks" approach to controlling development and building quality. Unfortunately, this 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. Neither will they meet the Government's impending requirements. Although there are 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 a serious loss of expertise in SC's departments concerning the built environment. Here, the need for better Government funding has been obvious, despite the planning department's money-making activities. 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 supported the retail and hospitality sectors, even in these most difficult of periods. There have been some efforts to market the town for its 'unique' history and high-quality heritage but these are somewhat swamped by the predominant PR promotion of a "vibrant visitable" town. 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.

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 highquality 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. There is a recent concern that the extensive discussions between SC officers and BTP about the use of some of Shrewsbury's special buildings, could delay the Council's statutory maintenance or other responsibilities. Furthermore, the focus of BID and the BTP has been on the town centre. Housing policy insufficiently accounts for "balanced growth" and probable "windfall homes".

6 Current Relevance

6.1 Concerns are increasingly pronounced as a number of planning determinations, policies, processes and relaxations to help re-generation, are exposing a low level of valuation for heritage. Re-generation initiatives following the Pandemic and more internet shopping, must use, and not erode, even slightly, the town's long-term genuine attractions.

6.2 This would be a good time for initiatives to be taken to alleviate this 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.

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/streets from some 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 level of concern for the whole built environment.

7 Some Possible Actions:

7.1 The evidence (and our beliefs) show that the town of Shrewsbury is special, mainly because of its built heritage. (eg a high number of Listed buildings and large Conservation Area.) As suggested in 4.2 above, this attracts tourists, shoppers and investors. 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 both 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 a more heritage-friendly Council and a more sustainable future for the town (and the County).

Some recommended suggestions:

- 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 SC's identified 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 Highways Departments and related contractors should consult Conservation officers and local Councillors on any changes to be made in Conservation areas, including the details of materials, etc. (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 emerging 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. (The 2020 draft is incompatible with current Government 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 be more instrumental in Shrewsbury's sustainable future. They should supplement existing actions.
- 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 is legally SC's responsibility and cannot be delegated. 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 provides examples of what the Trust has attempted and done towards this aim.)

- 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. 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 the County's heritage assets, as did Shrewsbury's Big Town Plan.
 - 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.
- 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 Big Town Plan has not included economic strategies to preserve historic buildings.
 - Some businesses do much to enhance their historic premises, (eg Henry Tudor House) while others do little, or actually harm the street.

- 5. Strategies and protocols to celebrate and benefit from the built heritage are weak.
 - There is no 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 protocols exist to ensure that repairs and alterations to surfaces of streets by Highways (WSP) (eg SITP) are done sympathetically with adjacent buildings' elevations. (Annex 5)
 - Enforcement actions to ensure proper maintenance have been few and often very belated. eg 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.
- 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.

<u>Annex 2</u>

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 to the Big Town Plan. It suggested proposals to make the town more pedestrian friendly. It supported the Council's Conservation Department in collecting 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. The Society is non-Political and has procedures to avoid bias from any 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 maintains a substantial archive of materials concerning Shrewsbury's built environment and 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.

<u>Annex 3</u>

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 the 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 of the tenancy). A Fol request to Shropshire Council revealed "no records" of why maintenance has not been enforced. Policies of encouragement have not worked. The Planning Authority was however, effective in stopping it being demolished, at an Appeal, when the Civic Society acted as a supporting 3rd party. Following this, the Authority did not support a Listing application, nor enforce maintenance schedules, despite the building's proven age and historical importance. The most recent permitted planning application was positively promoted by planners, against architectural expertise and Historic England's preferences. Nothing has happened since and the building remains unused and in poor condition. The Civic Society has an extensive dossier of its planning history.

The Stew saga exemplifies the Council's low valuation of heritage potential. Council strategies to encourage maintenance have 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.

<u>Annex 4.</u>

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. 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 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.

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