

HERITAGE LINK RESPONSE TO CLG CONSULTATION MODERNISING EMPTY PROPERTY RELIEF

1. Heritage Link brings together 83 voluntary organisations concerned with heritage in England representing interests from specialist advisers, practitioners and managers, volunteers and owners, to national funding bodies and local building preservation trusts. Much of the historic environment is cared for - supported, managed or owned - by these organisations. Some members have experience of dealing with empty listed buildings and all are concerned that such buildings are sensitively re-used or protected from deterioration.

2. We welcome the consultation as an opportunity to review the problems of bringing protected buildings back into use but point out that the distinction between listed buildings, buildings in Conservation Areas, locally listed buildings and unlisted historic buildings is inconsistent across the country since the Lists in several areas are out of date. English Heritage's intention to resume listing but on thematic lines is unlikely to improve matters.

3. The present position is that non domestic listed buildings are permanently exempt from rates, a concession that recognises that owners of listed buildings have a responsibility to maintain the integrity of the building.

Whether the removal of this exemption would stimulate new uses is difficult to say but these are our concerns:

- Listed buildings may be empty for a wide variety of reasons – some may be ruins.
- A partial exemption, say 3 or 6 months, doesn't take into account the sometimes very long time it takes to find an appropriate use for historic buildings. Where these are very large, or part of the complex site, the process can take two or three years. In these circumstances a timescale is irrelevant.
- Removing the exemption or putting a time limit on it may drive owners to adopt less suitable solutions, to encourage damaging alterations, to 'accelerate' deterioration, or to press more strongly for demolition.
- Exemption is only one of many factors in finding a new use for an empty listed building but acts in favour of the integrity of the building and should be retained.
- Local Authorities should not however rely on rate relief on empty premises as the only incentive to bring buildings at risk, often intractable cases, back into use but they should be more ready to use the existing powers they have that are specifically designed for historic buildings.
- We suspect that the intention to remove distortion in the tax treatment of different forms of property is intended to increase revenue rather than benefit the nation's historic environment.

4. We therefore consider that Option One - to continue to provide protected buildings with 100 per cent permanent relief from rates when they are empty - is in the interest of our national heritage. We do not think certain types of protected buildings should be treated any more favourably than others. A possible positive use of empty property relief could be to encourage the proper care of listed buildings if it was allowed during periods when major repairs are carried out in an appropriate manner.

We recommend that a review of rates might be better carried out as part of the review of PPG15 since this would enable the ramifications to be fully explored alongside such questions as to why these buildings become derelict in the first place.

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