

**Protecting our historic  
environment:  
Making the system work  
better**



**A response from  
CAMRA, The Campaign  
for Real Ale**

**October 2003**

## **Introduction and Summary**

- CAMRA has a special interest in the preservation of historic public houses and their interiors and in the historic built heritage of the brewing industry.
- We believe the best chance for the survival and sustenance of these assets, particularly the fast-dwindling examples of valuable internal pub fabric, lies with the maintenance and extended application of strong statutory protection, not with its dilution.
- We note that no new forms of statutory designation for buildings are currently under consideration, and we believe that the present gradings of I, II\* and II should be retained. We would, however, welcome more weight being given to 'historic' factors (as against purely architectural factors) in the listing process's interpretation of 'architectural or historic interest'.
- In relation to larger complexes (such as historic brewery sites) it would be beneficial if listing could be targeted to specific structures rather than the entire cartilage.
- We believe, strongly, that listing decisions should be taken solely on the basis of the historic worth of the building and /or its interior. Economic considerations should not be taken into account during the listing process.
- We commend the efforts of English Heritage and the DCMS in improving the protection of public houses over the last decade. There, however, remains much to do.

## **A Unified List**

*Q1.1 Would a unified List for England improve existing arrangements?*

- We support the need to have a unified national list.
- The inclusion of locally listed buildings as a separate section in the national list would help raise the profile of local listing and encourage more local authorities to compile local lists.
- The new unified List should be easily accessible to members of the public.

## **National Designation**

*Q2.1 Are the suggested safeguards sufficient to allow English Heritage to become responsible for maintaining the List?*

- We support the principle that the Ministers' role should be to make policy rather than to decide on each individual case. It is however vital that Ministers retain the power to call in important cases for Ministerial decision

*Q2.2 What other options might there be? For example, might English Heritage establish some form of independent committee to make the designation decisions?*

- As listing decisions are more than just an administrative task we would support the idea of English Heritage establishing an independent committee to play an important role in listing decisions.
- An independent committee, including laypersons as well as experts, would help ensure listing decisions are more representative of society as a whole.

## Criteria and Discretion

*Q.3 What criteria should be used to determine what items should be placed on the list?*

- We oppose the idea that economic considerations should be able to affect the decision to list a building. Allowing decisions to be made on this basis would undermine the credibility of the listings process.
- Listing decisions should be made solely on the worth of the building and/or its interior.
- Greater importance should be attached to the wider historical and cultural importance of a building and/or its interior.
- For some larger complexes, such as historic breweries, we believe it would be beneficial if listing could be targeted to individual historic structures rather than the entire cartilage.

*Q4.1 Should the present gradings of I,II\* and II be retained.*

- The current lists should be retained. We see absolutely no reason why these gradings should be abolished

*Q4.2 Should some of the items at grade II move onto local lists? What safeguards would be needed?*

- We oppose this proposal.
- Allowing items at grade II to be moved to local lists would be a retrograde step, as it would lessen the protection of buildings that are an important part of our national heritage.
- Heritage is of national importance and responsibility for its preservation should not be devolved to under-resourced local authorities who lack key statutory powers.
- Local listing is an inadequate replacement for national listing because the Use Classes Order 1987 and the General Permitted Development Order limit the protection that local authorities can provide to buildings on the local list.
- Assessing which items should be moved to local lists would be an enormous task consuming countless man-hours, which could otherwise be dedicated to the protection of our heritage.
- Moving some Grade II buildings to local lists managed by Local Authorities could mean that political and economic concerns would undermine the objective of protecting our historic buildings.

## **Statements of Significance**

*Q5.1 Would a requirement for statements of significance help to establish for owners and local authorities what was important to conserve? How could the statements take account of the inevitable changes in values over time?*

- This is a very welcome proposal and one that would benefit owners, local authorities and the public at large.
- Statements of significance would help ensure proper protection is given to historic pub interiors.
- A mechanism should be in place to ensure that statements of significance can be amended where new evidence emerges.

*Q5.2 What should be the process for drawing up statements of significance for existing entries?*

- CAMRA would be delighted to work with English Heritage, continuing our established partnership role, to ensure that all listed public houses in England have full and comprehensive statements of significance.

## **Openness and Protection**

*Q6.1 Should the listing process become open and who should be consulted on an application?*

- We would support making the process of listing more transparent provided that full protection is applied while listing is under consideration.
- We welcome the idea that the public and consumers would be able to comment on listing applications. Consultation should be open to individuals as well as formal groups and organisations.

*Q6.3 Should protection be applied during the period when listing is under consideration?*

- We welcome this proposal as it will strengthen the integrity of the listing system and prevent potential abuses.

## Appeals

*Q7.1 Should there be a right of appeal? In what circumstances would a right of appeal be justified?*

- In principle we support a right to appeal, albeit on limited grounds e.g. that there has been a fault in the process.

*Q7.2 Should the suggested right of appeal apply just to owners or to other interested parties as well?*

- We believe that the right of appeal against a **decision to list** should be restricted only to the owner. This would prevent potential purchasers or developers from appealing against a listing decision with a view to getting the listing removed so they can move in, purchase the site and redevelop.
- We believe that the right of appeal against a **decision not to list** should apply not just to the owner but also to interested parties including conservation groups, consumer groups and interested individuals.
- Appeals should only be allowed to proceed if they are in the public interest

## Management and Control

*Q8.1 Should English Heritage seek to define individually at the time of listing what works will or will not require consent or should only generic rules be applied?*

- We believe that consent should continue to be required for all alterations that will materially alter a listed building. We are therefore wary of the proposal to specify what works will or will not be allowed at the time of listing as we believe it would be impractical in terms of resources and could lead to important oversights.
- However in order to assist Local Authorities in decision making and to provide greater clarity for owners we would support the provision of non binding guidelines, from English Heritage as to what works are likely to be allowed and which would definitely not.

## **Local Historic Environment**

*Q13 What planning guidance on protection of the historic environment would be of most value to local residents and developers?*

- We would welcome guidance that recognises the importance of ensuring that listed public houses remain trading as such. Listed public houses are part of our living heritage and changes of use should be strongly resisted.

*Q15 Should there be a mechanism for preventing demolition of locally listed buildings without consent? Should this be linked to development proposals? What safeguards would be needed to ensure the quality of local lists.*

- The current situation, which allows the demolition of locally, listed buildings without consent is totally unacceptable and undermines the value of the local listing process.
- We strongly support the use of local lists and believe this proposal would help encourage more Local Authorities to compile them.

## **Need more information?**

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## **Appendix 1**

### **About CAMRA**

CAMRA, The Campaign for Real Ale is a not-for-profit independent voluntary consumer body which exists to promote and defend access to full-flavoured and distinctive beer and the best features of the British pub.

CAMRA was founded in 1971 and membership our membership currently exceeds 70,000.

CAMRA's mission is to act as the champion of the consumer in relation to the UK and European drinks industry. Its aims are as follows:

**Maintain consumer rights**

**Promote quality, choice and value for money**

**Support the public house as a focus of community life**

**And campaign for greater appreciation of the public house, traditional beers, ciders and perries as part of national heritage and culture**

The Campaign is funded by member subscriptions, sales of publications and products and proceeds from beer festivals. Other than revenue from advertising in our member's newspaper, it is not funded in any way by the industry. Only individuals can join CAMRA.