2 February 2005

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Dear Alison,

Thank you for the opportunity to offer comment on the Heritage Strategy for Liverpool.

Set out below are the responses submitted on behalf of the Merseyside Civic Society to the series of questions posed in the consultation document.

1. **What do you feel should be the priorities for a Heritage Strategy for Liverpool?**

The priorities of a heritage strategy for Liverpool can be expressed simply:

A. To arrest long-term neglect through protection and enhancement of *all* the qualities of place and people that make Liverpool distinctive and historically unique, not merely those that enjoy existing statutory protections.

B. To start creating high quality buildings, spaces and places worthy of becoming valued cultural heritage of the future.

C. To celebrate the entire city, not just the city centre, as a living ‘historic metropolis’, England’s greatest Georgian, Regency, Victorian and Edwardian city.

2. **What are the key projects and initiatives that need to be developed / completed?**

The following projects are listed below and then each explained more fully in turn.

a) Learning the lessons of the past at leadership level.

b) Strengthening the Conservation and Planning department.

c) A full ‘Conservation Review’ of statutory listed building, conservation area and historic park protections, in partnership with communities and the Neighbourhood Management Service.

d) A wider ‘Neighbourhood Historic Environment Assessment’ of local assets, beyond those covered by statutory protections.
e) A city-wide Historic Environment Masterplan - a unified spatial heritage development strategy to express plans for the key elements of metropolitan Liverpool.

The principal elements that can be readily identified include the following – each of which is elaborated more fully below:

i) The Great Streets
ii) The Great Parks
iii) Landmark Buildings – Pubs, Churches, Cinemas etc.
iv) Brodie’s Parkways
v) Public Housing
vi) The Waterfront
vii) Suburban Villas and Park Estates
viii) Village Centres (e.g. Everton, West Derby, Woolton)

a) Learning the lessons of the past at leadership level

Liverpool’s painful impoverishment since the late 1960s at least saved its incomparable historic environment from the total destruction by redevelopment suffered by other provincial cities. However, its long awaited regeneration now risks the potentially perverse effect of completing the district clearances put in train in the 1960s.

As a sort of urban laboratory for all that is best and worst in town planning theory and practice, it would be unforgivable if at this point Liverpool fails to recognise the opportunity now at hand, and repeats the failures of its recent past.

Achieving safety for the remains of the existing historic fabric, too much of which is still being lost, and turning round the low civic quality common to most new developments, is thus a huge step which requires a radically improved strategic approach to Liverpool’s urban management.

Window dressing exercises like the appointment of Heritage and Urban Design Champions appear to have done little to reverse the decline in development standards.

b) Strengthening the Conservation and Planning department

It will not be enough to rely on the planning authority’s ability to uphold existing Listed Building and Conservation Area protections, as it has proved singularly unequal to the size of the task.

Indeed, appreciation and protection of the special historic importance of Liverpool must go far beyond the buildings and areas covered by statutory designations, and include all the neighbourhoods of the city.
As a first step, significantly strengthening the resources and independent scrutiny dedicated to the historic environment protection function of the Planning and Conservation department is an essential starting point if the Strategy is to make a worthwhile impact.

c) A full ‘Conservation Review’ of statutory listed building, conservation area and historic park protections, in partnership with communities and the Neighbourhood Management Service

An early task should be a full ‘Conservation Review’ of the value of all of Liverpool’s Conservation Areas and Historic Parks, of which there are well over 30.

Following active stakeholder engagement, new policy protections, publicity literature and promotional materials for each should be produced and distributed widely in an urban design and heritage teaching programme.

In undertaking these Conservation Reviews, Planning staff should link closely with the new Neighbourhood Management Service to facilitate a broad multi-agency approach that brings in schools, highways, the police etc, and builds stronger networks amongst tenants and residents’ associations, Friends groups etc.

This would ensure officers and other stakeholders were fully familiar with the heritage importance of these places, and provide a wonderful opportunity to engage local communities in renewed stewardship of their historic neighbourhoods.

d) A wider ‘Neighbourhood Historic Environment Assessment’ of local assets, beyond those covered by statutory protections

As well as the review of designated historic landscapes, similar appreciation of non-protected but locally valued qualities is urgently needed.

‘Neighbourhood Historic Environment Assessment’ exercises led by planning officers through the Neighbourhood Management Service need to take place right across Liverpool, to ensure the ‘power of place’ is captured in areas not covered within the statutory red lines.

This review process must not be used as an excuse to delay investment in Liverpool’s historic fabric.

For example, it is a glaring omission that there are not already active strategies for the restoration of some Liverpool’s key historic parks, including Paxton’s Princes Park in Toxteth, and his apprentice Edward Kemp’s first solo design work at Newsham Park between Kensington and West Derby.

It is even more disgraceful that investment in park restoration now appears to be predicated on reducing the stock of Historic Parkland by giving chunks of it away for...
development, as is happening in Stanley, Springfield, Rathbone, Wavertree, Sheil and Newsham Parks.

e) A unified spatial heritage development strategy – the Historic Environment Masterplan

There are a number of worthy projects too numerous to mention in detail that are aimed at heritage, not least the World Heritage Site along the central waterfront, but still no sense of a real city wide vision to drive up quality across the public realm and restore civic pride through appreciation of Liverpool’s deep historic qualities.

Regeneration initiatives and new developments often make no reference to place or the past, erasing old names, buildings and street patterns. Where links are made, they usually remain tokenistic and shallow, resulting in weak pastiche design of the flimsiest substance.

The Heritage Strategy therefore should be the catalyst for an historic environment masterplan. This will not only map an overview of special initiatives like the successful Ropewalks, the Monuments Strategy, the new Promenades Strategy and so on, alongside statutory designations like Listed Buildings, Conservation Areas and Historic Parks, but more importantly pay urgent attention to neglected elements of Liverpool’s non-protected metropolitan structure, and put in place proper strategies for their revival by high quality restoration, stakeholder engagement and cutting edge new design.

Such a strategy should be embedded within the statutory planning system via the new Local Development Framework.

Neglected elements of Liverpool’s urban form that could drive regeneration include:

i) The Great Streets

The vast network of radial routes laid out by the Town Improvement Committees in the mid 19th Century that form the framework of Liverpool as the grandest Victorian Metropolis, the equivalent of Singapore or Hong Kong in the 20th Century, are ill appreciated, their form abused by highways imperatives and low grade development.

- Whole districts of the city (Smithdown, Kensington, West Derby Road, County Road, Scotland Road, the Dock Road etc.) are defined by these corridors, making Liverpool unique in having an interconnected web of linear district centres, rather than the more conventional nodal ones of slowly ‘swallowed up’ villages.

- This Victorian metropolitan development model is in line with the very latest Urban Task Force thinking on ‘MUHD’ - mixed use, high density urban design offering good, active streetscapes, varied facilities and movement options well-connected by pedestrian and public transport linkages.
- The Great Street network should be appreciated as a platform for the rebuilding of walkable, sustainable communities, but is currently subject to further damage by inappropriate city highways and planning policies. The allowing of a single storey McDonalds drive-thru at the most important junction site in the New Deal for Communities area of Kensington is a key example of current policy failure squandering long-term regeneration potential.

- Those 'great streets' that remain intact are highly popular business and residential environments, now enjoying market led regeneration, such as Smithdown Road and Aigburth Road. Others have been left semi-intact but at great risk of further demolition and decline, notably Edge Lane, County Road and the A57 Kensington-Prescot Road; these sustain vibrant communities despite their grotesque impoverishment. The most callously abused of the ‘great streets’, like Scotland Road and Stanley Road, have suffered systematic destruction of their form and character, and hence show all too clearly signs of the consequent social and economic devastation.

- The first Ring Road scheme, only partly realised and best manifested in Sheil Road and Priory Road, brought about the legacy of great parks encircling the Victorian core to the north, east and south.

- Where many of these streets met or crossed, fine public spaces could be found. In the city centre, these can be identified on maps by the telling suffix ‘place’. Examples include Ranelagh Place, Canning Place, St. James’s Place, Pembroke Place and so on. We are pleased that Liverpool Vision appears to have identified most of these in its strategies, and suggest a similar exercise beyond the noose of the inner-ring road, where attractive spaces like Islington Square, the Breck Road-Lower Breck Road green triangle and Mount Vernon Green are undervalued.

ii) The Great Parks

The English Heritage National Register of Historic Parks describes Merseyside’s Victorian Parks as collectively the ‘most important in the country’, which effectively puts them amongst the best examples of historic urban green spaces in the world.

- The three largest parks were laid out as part of a grand vision for a great ‘Circular Boulevard’ and ‘Green Ring’ to encircle the city during the mid-19th Century. This is connected to the lofty ambition of William Roscoe and the city fathers to create a new Renaissance city, a northern Florence or Rome.

- The impact of the Town Improvement Committee on this metropolitan structure deserves to be better understood – at present, even the city’s own conservation department appear unaware of the details of this seminal civic vision.
Liverpool’s continuing neglect and strategic contempt for these priceless heritage and health assets is amongst the most shameful cases of civic vandalism wreaked in the UK in recent years.

**Stanley Park (1870)**; is the most telling exemplar of this – 40% of the Listed Historic Park designed by Kemp, and described by Pevsner as architecturally the most important in the north of England, is set to be lost, to a commercial development carried out as a joint venture between Liverpool City Council and Liverpool Football Club, and given permission by Liverpool Planning Authority.

**Newsham Park (1868)**; Kemp’s first solo park design following his apprenticeship with Joseph Paxton at Chatsworth, Princes Park and Birkenhead is also Grade II Listed and a conservation area, but has itself being subjected to unpopular development proposals, with a new secondary school now being built on the site of its Victorian glasshouses and nurseries.

An area consisting of some 30% of its 131 acre green space has been signalled as available for ‘comprehensive redevelopment’ in secret maps sent to housebuilders under the Housing Market Renewal Initiative during 2003 (See BBC North West TV News Report 7th August 2003).

On Prescot Drive on the southern edge of Newsham Park, large Victorian villas within the park conservation area have been left derelict for many years in Liverpool City Council ownership. These were designed to provide enclosure, overlooking and activity round the park, but are now being demolished one by one without conservation area consent as civic neglect leaves them in danger of imminent collapse.

There has been little if any capital investment in planting, pathways etc. for at least a generation, and a £4m HLF blueprint supported by the local Friends and residents groups has been dropped without adequate explanation, despite in principle funding approval for a substantial first phase.

**Princes Park (c1840)**; Paxton’s first ever city-park and thus the precursor for both Birkenhead and Central Park in New York, currently lies neglected with no sign of a strategy for its renovation despite strong pressure from local community groups.

Paxton’s Listed boat house was demolished by council workers wielding pick-axes in the Autumn of 2004, an incredible act of destruction from a Local Authority on one of the jewels it is charged with protecting.

**Botanic Gardens (c 1820)**; This early 19th Century classical green space is the city’s first public park, built to house the unmatched collection of plant specimens collected on the citizens’ maritime adventures across the globe.

It is in a parlous condition, statues, fountains and monuments smashed, planting and pathways decaying.
Sefton Park (1872); The largest and grandest of the ring of Victorian Parks has suffered the same years of decline as its older sisters. Recently, its finely carved wooden boathouse was demolished after many years of decay.

There is hope in the form of HLF restoration proposals, which we welcome as long overdue.

iii) Landmark buildings - Pubs, Banks, Churches, Cinemas etc.

One of the finest qualities of Liverpool’s historic street network is the way corners and junctions are marked by distinctive landmark buildings, usually pubs, banks or places of worship but later on the picture palaces of the early 20th Century.

Breweries, banks, cinema chains and the many and various religious denominations were in a sense engaged in the same game, of competing for souls. They engaged in an extraordinary process of one-upmanship expressed in exuberantly detailed architectural designs on the most prominent sites at all spatial levels.

Liverpool’s own bank, Martins Bank, had its headquarters at Water Street in a Herbert Rowse designed masterpiece, a building now very much celebrated. However, its network of finely designed and built district banks around the city is little appreciated, despite giving a metropolitan unity and coherence across the entire urban area.

Civic institutions like schools, libraries and swimming pools showed the same unity and consistency of quality design in Liverpool’s late Victorian and Edwardian hey-day. The Carnegie Libraries designed by Thomas Shelmardine and others again help define Liverpool’s unique sense of place. Lister Drive Library and Swimming Pool are especially good examples that currently face decline through under-investment.

Many such buildings remain in use as popular local facilities. However, as ever in Liverpool, many more have been mistreated and removed. A strategic approach to protecting local landmarks and focusing redevelopment proposals around them is urgently overdue.

Amongst the innumerable examples are the Belmont Pub on West Derby Road, St. Cyprian’s Church at the Holt Road-Edge Lane junction, the Bethesda Chapel on the Penny Lane ‘roundabout’, Grigsons Well on Low Hill, the Botanic pub on Botanic Road, the Boundary Pub and former Martins Bank at the junction of Smithdown Road and Lodge Lane, and the fine pubs left in isolation by clearances along Stanley and Scotland Roads.

Ill-advised land assembly policies such as the council led ‘Gateways’ Initiative’ are putting such landmarks under renewed threat.

iv) Brodie’s Parkways
This late Victorian and Edwardian system of broad, tree lined radial and ring-road boulevards linking Queens Drive allowed Liverpool's 20th Century suburbs to flourish, and anticipated the arrival of the modern, motorised city. Its historic significance cannot be overemphasised – often assumed to be a copy of American planning approaches, it is actually contemporary, or even precedent, to the city expansions across the Atlantic, with Brodie in close touch with fellow engineers in Chicago and elsewhere.

v) Public Housing

Much of the architectural legacy of Sir Lancelot Keay and his fellow city architects and planners like Adshead has been thoughtlessly lost with the unnecessary demolition of art-deco walk up flats across the city during the 1990s, such as Gerard Gardens in Islington and Oswald Gardens in Old Swan. However, that which remains like Speke and Norris Green deserves greater historic appreciation.

Even the maligned tower blocks have shown themselves capable of supporting thriving communities, provided they are well managed and maintained. The Housing Action Trust and private developers the Legendary Property Company have proved the worth of imagination and innovation at their blocks in Sefton Park and Everton Park. It is regrettable the same approach was not taken at Sheil Park and Olive Mount, where well-designed blocks have been condemned and public green space has been taken to re-house tenants.

vi) The Waterfront

The significance of Liverpool's unmatched stretch of mile after mile of historic docklands is increasingly understood by historians. It is very well documented, not least in the latest editions of Pevsner.

Despite this knowledge, very low quality development proposals damaging to this unique asset continue to receive planning permission from the city council.

The closure of the huge old granite ‘casements’ at Herculaneum Dock and the feeble new architecture now surrounding them is just one case in point.

The hideous multi-storey at Princes Dock within the World Heritage Site, and the ill-planned Royal Quay designs are others.

A development strategy for the waterfront should include as its first priority the re-opening of the network of historic docks filled for car parking and shed development in the 1980s and 90s. The long term vision should be to recreate the city's sensational system of 'water squares', to be surrounded by world class buildings, an incredible opportunity to provide modern interpretations of Albert Dock style colonnades stretching for tens of miles of
quayside and connecting out from the old dock estate to the streets of currently deprived areas in Everton and the Dingle.

Stanley Dock Warehouses ad the Leeds Liverpool canal terminus should be a key northern driver for this waterside strategy, along with the former International Garden Festival Site in the south.

vii) Suburban Villas and Park Estates

Wealthy merchants laid out early suburban estates of fine villas at a short ride’s distance from the city from the late 18th Century onwards. Some of these are well studied, like Cressington and Grassendale, some are known but fragmented, like Haymans Green, Sandfield Park and Victoria Park, while others are almost forgotten, like Prospect Vale, Fairfield, Beech Street, Breckside Park, St. Domingo’s Grove and Oakfield Park.

The architectural qualities of these and other scattered Georgian, Regency and Victorian Villa developments have very positive impacts on often deprived neighbourhoods, but enjoy very limited protection from inappropriate alterations or demolition.

viii) Village Centres (e.g. Everton, West Derby, Woolton)

These are the cores of settlements that have been absorbed into Greater Liverpool as it has expanded over the last 150 years or so. Many of their distinctive heritage features have been lost through past selective demolition, intrusive/over development, traffic engineering, and those that remain are vulnerable to similar matters on a continuing basis. What is needed is not only continuing care and management but clear statements of principles [written/visual/statistical] in terms of "making places" i.e. a future for the past while allowing for change and development related to small-scale environments.

3. What are the key challenges and how can these be resolved / moved forward?

For two generations now Liverpool city council has fallen very far below the exceptional standards set in its pre-war civic development, and has become a by-word for ill advised clearance schemes, poor quality new build and neglect of unique historic assets.

If the Heritage Strategy can effect the necessary enlightenment, the key challenge will be to change Liverpool’s municipal culture from one that resists local passion about development to one that harnesses it.

To be convincing, the Strategy will need to accomplish a number of difficult tasks:

a) The fundamental priority is that this document and launch should not be another window dressing exercise. To be effective it must genuinely embed appreciation of
the value of Liverpool’s historic environment amongst senior council officers, elected members and stakeholders.

b) To achieve such success it will be powerful to compose a dossier of evidence pointing to examples of the type of damaging development decisions a successful Heritage Strategy will change in practice. Illustrations should highlight:

- The damage to local distinctiveness caused by demolition of Victorian villas, terraces and townhouses, like those about to be removed for road widening and land assembly along Edge Lane, and those in the HMRI clearance areas around Kelvin Grove, Granby, Anfield and the Welsh Streets (see the MCS submission to the ODPM Empty Homes and Low-demand Pathfinders Inquiry on the MCS website under Correspondence).

- The opportunities lost through continuing demolition of historic local landmarks like pubs, post offices and places of worship. Recent examples of quality pieces of architecture left to the wrecking ball or neglect include the Windsor Hotel on Kingsley Road, the Hall Lane GPO building and the Welsh Church on Princes Avenue.

- The short sightedness of pursuing the lowest statutory standards in public realm maintenance programmes – replacement of paving slabs with skimmed black bit-mac is a mean minded symbol of the council’s view of ordinary streets and citizens which will do great damage to local streetscapes and undermine community pride. Removal of cast iron Victorian and ornate wrought iron Edwardian streetlamp columns, and replacement by shoddy steel poles with intrusive advertising hoardings has a similar effect of cheapening the public realm.

- The squandering of opportunities on key sites via low quality development. Examples include the new Tesco site in Old Swan, which fails to relate to the curved configuration of the historic junction around it, and the execrable student flats next to Lime Street Station.

- The continued neglect of historic jewels in public ownership like Shelmardine’s Everton and Lister Drive Carnegie libraries, and the Villas around Newsham Park.

c) The radar of public debate and heritage stewardship must extend beyond the charmed circle of the city centre and prosperous suburbs to take in what the Government’s Index of Multiple Deprivation shows to be a highly deprived city once one looks north of a line beginning around Arundel Avenue.

d) An officer culture that sees heritage as a hindrance to regeneration rather than a help must be broken down.
4. How is the heritage agenda being taken forward by your organisation? and
5. How do you think that work on heritage could be most effectively integrated into wider economic and social agendas in the city?

Of fundamental importance here are the above points about a strengthened statutory planning and conservation resource, and a much closer devolved role for planners and other historic resources like museums and libraries within the neighbourhood management service.

We hope that you will find these comments and suggestions useful in your efforts to move forward in the development of the Heritage Strategy.

We shall look forward to further opportunities to contribute to the development of thinking on these issues of mutual concern.

Yours sincerely

Peter Brown (Dr)