



· INSTITUTE · OF · HISTORIC ·  
BUILDING · CONSERVATION

*Making Heritage Work*

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Dear Sirs

## **NATIONAL HERITAGE PROTECTION PLAN**

The Institute of Historic Building Conservation (IHBC) is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

Thank you for inviting us to participate in this consultation.

The Institute has considered the draft priorities for action and the priorities for understanding analytical notes. We have a number of general comments and some additions and suggested heightening of priorities for action in some cases.

### **First the general comments:**

There is some lack of clarity to the consultation, which we appreciate relates in part to its status as a 'pre-consultation'. While we very much welcome the opportunity to engage early on in these processes, the precise remit and scope of the plan – within both EH's own wider corporate planning and its place within wider sector partnering – has become somewhat confused. It should be appreciated that some sector responses may originate more in lack of understanding of the status and future progress of the plan than in any fundamental disagreements with its wider intentions and aspirations.

We welcome the consultation as a part of English Heritage's wider modernization strategy for heritage protection. We welcome in particular the re-invigoration of the conservation and protection objectives in the areas covered by the NHPP which underpin EH's the primary corporate objectives. We also welcome the focus in the Plan on all of England's valued historic places, and not simply the identification of nationally significant heritage as some have interpreted it, as this represents a crucial dimension to the work of EH and one that is easily forgotten by stakeholders.

It is particularly welcome that the research and information activities linked to the NHPP should be explicitly shaped by conservation and protection needs assessments and outcomes. This is appropriate given the current government's focus on cost-effective beneficial outcomes. In light of this, the assessment procedures for giving priorities based on capacity and adding value ('Identifying Priorities for NHPP') is especially welcome as it integrates the research and investment with the conservation outcomes in a manner that has previously been more implicit than explicit. However, as detailed below, there needs to be a substantial revisiting of the scoring system as a whole to make sure that proper assessments are taking place at the start of the NHPP planning process because, as set out, they seem to reflect more the origin of the plan than the future trajectory it wants to adopt.

The overwhelming focus of the Plan's 'Priorities for Action' appears to be on understanding and defining significance despite the comparatively limited benefits these will bring to conservation outcomes. This is not to say that there is not a leadership role for EH in determining new assets and significance. However the Plan, in its current form, gives the impression is that the primary corporate concern lies in the area of significance. This is a substantial anomaly that must be redressed both in the contents and the presentation of the plan. It is reinforced by the fact that in the published 'master scores' file the 'Enhancement of Protection' category is subsumed into the Threats Worksheet, which makes proposed rankings in this area potentially inconsistent<sup>1</sup>.

The Plan in its final form should give clear and prominent priority to specific protection outcomes and infrastructure such as locally generated protection, conservation and enhancement. It should also expand on the understanding of the very processes by which we secure conservation, as this understanding will be used to improve the protection processes.

For example there is little on conservation practice; that is the integration of evaluation, management and intervention which reconciles significance with utility and with a range of other factors. Indeed it also fails to recognise conservation as the primary process that helps identify new significance for communities. Without establishing such significance, conservation and protection will not be cost effective or sustainable. We think the four-step structure inhibits the wider application of the Plan, and would propose its restructuring in the terms described below.

The document focuses more heavily on the activities of heritage professionals in their academic and research roles, as archaeologists or architectural historians, than the built environment professions who are primarily responsible for the care of the vast majority of the nation's built heritage.

The Plan starts with English Heritage's historic research priorities and leaves to the end the analysis of the very conservation processes that the Plan should support because of their delivery of heritage protection. Given the substantial asset base currently recognised by the terms 'historic environment', those areas in the Plan covered by the 'enhancement of protection' (Area 4) should be the Plan's focus, underpinned by two other key areas, 'Response to threat' and 'Survey and assessment'. This last area represents a recommended conflation of the areas currently covered as 1 & 2, to help the plan re-focus on its overarching priority to deliver protection.

We recognise the historic roots of the document in EH's identification and evaluation of traditionally valued heritage, under the Plan's remit to protect and conserve our heritage. However, the IHBC considers that the NHPP must deal more substantially and more prominently with those processes that lie at the heart of successful heritage protection

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<sup>1</sup> see <http://www.english-heritage.org.uk/professional/designation/national-heritage-protection-plan/nhpp-survey/nhpp-survey-background/>

and conservation, notably planning policies and processes, economic drivers, industry priorities, social imperatives, projects, funding, and design work and how these affect the issues involved in each category. Similarly, there is little or no mention of matters such as economic development, regeneration, communities, urban design and place-making all of which can have profound impacts on heritage protection. In particular, the document deals inadequately with utility value and the need to reconcile significance with use and wider urban design issues.

While there is always a place for the detailed understanding of, say, materials science in the deterioration of stone, the conservation and heritage protection outcomes sought in this Plan would be substantially improved through a better understanding and application of social, economic and policy measures that control how we value and manage that heritage, and how we can improve the protection processes. Certainly, if a wider sector buy-in to the Plan is sought, as the web site suggests, it is imperative the Plan itself should properly reflect the real priorities faced in the protection and conservation of the historic environment.

Similarly, the Plan does not deal adequately with the way in which conservation professionals deliver conservation by reconciling significance with other social, economic and environmental factors – for example negotiations with highways professionals and undertaking projects with communities. Where it does deal with them they are afforded an unacceptably low priority.

We note that neither asset transfer (which scored high) and investment reduction (which didn't), do not actually appear in the Priorities for Action (unless we have missed them) for reasons that are unclear to us. We would consider the process involved here to be matters of substantial import to the Plan, as the assessors providing the master scores, and would ask that these be reintroduced for consideration as part of the Actions, and a testing undertaken of the scored list against the published priorities for action.

Two aspects which we think is missing from the section on threat assessment and responses in the Priorities for Action are:

**Heritage property owned by central and local government and their agencies.**

We think, in the current fiscal climate, that there will be increased pressure to maximize property values and that this may not favour the preservation of heritage significance. We think this should be placed in the higher priority category.

**The proper and informed study of the potential for tax incentives** (notably regularising VAT for traditional and historic building works) must be a key priority. There is a substantial body of evidence from a range of relevant bodies, and their integration, or support for their promotion, should be among EH's first priorities.

Aspects which we think should have **enhanced priority** are:

**Mining heritage.** Some of this is deteriorating significantly for lack of active conservation.

**Workers', Council and public housing.** We agree with EH that the threat to this is acute and think, under the circumstances, it should be afforded a higher priority.

**Woodland landscapes and veteran trees.** Whilst this is more the province of other agencies, heritage interests are not insignificant. We think English Heritage should give this higher priority so that these interests are not lost amongst those of the other agencies.

**Capacity loss in local authorities (& Statutory planning & environmental management).** We would query the master scores assessment of the LA capacity area as it appears to suggest low scores for assessments of partnership, opportunity and impact that seem to us to directly contradict the statements made. As it stands, we would agree with the commentary, but dispute the markings. In addition, we see no scores for the closely related – but distinct – area of Statutory Planning and environmental management.

We await reconsideration of these assessments. But in the meantime, we have a disparate but substantial body of evidence about the importance of local delivery of conservation through planning authorities and the devastating impact cuts are already making to those services. There is a clear and urgent need to integrate the understanding of the importance of proper conservation skills (discussed below) with the delivery of conservation and protection outputs, and it is inconceivable that the NHPP give anything but the highest and most urgent priority to this area. In the absence of any indication about the reasoning behind this priority, we must assume that this is something that the Plan considers beyond its reach in terms of the limited resources available.

The IHBC would argue that a more substantial investment in the promotion of the understanding of the delivery of protection through LPAs would make a huge impact on those services. In simple terms, it does not require substantial investment to develop the links between generic LA outcomes and conservation services, in the manner presaged by our own research paper “How to Care for Places and People”<sup>2</sup> and implemented for its sector through the MLA’s leadership in its ‘inspiring learning’ framework<sup>3</sup>, also used by EH). Yet the impact of these tools, properly developed for use by built environment professionals, could substantially revolutionise the standing and credibility of conservation and heritage protection within local authority corporate structures.

Aligned to that, support for the IHBC’s long-standing promotion of infrastructure support for Conservation Officer Groups (COGs), would first render EH’s investment in conservation services comparable to its investment in archaeological infrastructure provided through support for ALGAO. It would have a minimal impact on EH’s expenditure, but would build capacity and cohesion across all professional services with conservation roles in local authorities.

Supporting research/investment strategies such as these, as well as enhancing partnership in the sector would make substantial differences to heritage protection at costs that are minimal compared to more academic research projects or high-expenditure training programmes.

**Conservation skills shortages [and their recognition and support]:** The lack of understanding of the importance of conservation skills – those skills required for securing their key outcome on the NHPP – as well as their shortage, must rank among the highest and most urgent concerns of the Plan given its objective. Not only do we have professional bodies with substantial roles in delivering historic environment conservation failing to operate to the conservation skills sets enshrined in the 1993 ICOMOS *Guidelines* for conservation education and training, but there are large parts of key conservation bodies that do not themselves espouse relevant conservation standards. There are considerable opportunities to secure added value heritage protection processes and investment through informed proactive partnership of the sort the IHBC has already developed with English Heritage’s research and enabling programmes. It is most unfortunate that the master scores table appears to assess conservation skills first under craft skills (41.a), and following comments that reveal limited understanding of craft

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2 <http://tiny.cc/nutm>

3 <http://www.inspiringlearningforall.gov.uk>

issues then summarise them as a medium priority under the heading of 'Craft conservation skills', and then present them as conservation skills in the consultation paper. This confusion – which only gives rise to further confusion – is most unfortunate. Clearly this area must be re-assessed in its entirety, and in direct consultation with the IHBC to ensure that informed conclusions are secured.

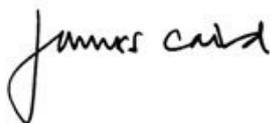
**Conservation Funding:** In so far as funding for works is part of the remit of the NHPP (a point which remains unclear given the Plan's primary focus and the apparent absence from the master-scores) the IHBC – and, we are sure, any part of the sector conserved with conservation and protection – would consider conservation funding areas to be the highest priority for the plan. This is not least as, for our communities, conservation funding brings immediate benefits in terms of work, place and sustainability, and their beneficial outcomes sit far in advance of any academic studies of our past.

**Social exclusion.** Widening public access to and understanding of heritage issues should, in our view, be a high priority.

**Permitted development and piecemeal change.** Given the enormous pressure to relax planning controls for reasons climate change and lessening the impact of Government on the public and business, this aspect should be given substantially higher priority.

We hope these comments are of use and we would be delighted to expand on these, and on opportunities we see for partnering and project development, at any time as the NHPP progresses.

Yours faithfully

A handwritten signature in black ink that reads "James Caird". The signature is written in a cursive style with a large initial 'J'.

James Caird  
Consultant Consultations Co-ordinator