



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

Culture White Paper consultation
DCMS
100 Parliament Street
LONDON
SW1A 2BQ

James Caird
Consultant Consultations Co-ordinator
IHBC Business Office
Jubilee House
High Street
Tisbury
Wiltshire
SP3 6HA

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Tel (01584) 876141
Web site www.ihbc.org.uk
E-mail consultations@ihbc.org.uk

Dear Sirs

THE CULTURE WHITE PAPER : A CONTRIBUTION TO THE DEBATE

The Institute of Historic Building Conservation (IHBC) is the professional body for building conservation practitioners and historic environment experts working in England, Northern Ireland, Scotland and Wales, with connections to the Republic of Ireland. The Institute exists to establish, develop and maintain 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. We appreciate that the recent themed consultation process was mainly aimed at getting new ideas from new sources. Nevertheless, we believe that many of the strengths of the heritage sector are contained in the well-understood techniques and procedures that have developed over the past 50 years and we would not wish to see good practice disappearing in a sea of new initiatives.

New ideas must not result in any loss of heritage protection and should be thoroughly developed before being the subject of detailed scrutiny and formal consultation. The Institute notes that many very worthwhile ideas have been extensively developed in the past from *Power of Place* (1999) to *A Force for Our Future* (2001) etc. which the Department were unable or unwilling to take forward but which would bear re-examination. The fact that they were not generated yesterday does not invalidate their value.

We support the process of thoroughly taking stock under the new administrative arrangements but we thought we should encourage you in your deliberations to be clear

about need to balance new thinking with the fundamental principles of good conservation.

We contributed to the submission already made to you by the Heritage Alliance as one of the 100 members referred to in it and we thoroughly endorse the analysis and proposals contained in it. We have arranged our further thoughts under your four themes.

PLACES

1. There is a vast array of evidence that historic places: sites, buildings, settlements and localities, are widely valued by the public and add great value to their communities and economies. Conserving these for their intrinsic cultural value and for the benefit of future generations is already recognized by Government as being of great importance and the Culture White Paper needs to emphasise this.
2. The White Paper also needs to emphasise that we have a common inheritance and that the protection of the wider public interest in heritage matters cannot always be squared with the private aspirations of property owners. The principle that the public interest needs to be given priority where it is clearly irreconcilable with private objectives should be clearly reaffirmed.
3. There are considerable pressures, many of them also of great importance, which threaten our heritage places and render them liable to gradual erosion of significance and quality. Among these are:
 - ◆ The progressive slackening of planning controls in the supposed beneficial facilitation of new development but which has implications for the long-standing protection of our historic towns and villages.
 - ◆ The rapidly decline of LPA specialist expertise essential to properly evaluate applications for planning and heritage consents properly.
 - ◆ The even more rapidly declining LPA specialist expertise necessary to give the owners of heritage property advice before they spend money on design work and developing their ideas in other ways. This is an issue highlighted by Historic England's Heritage Counts 2015 audit.
4. It seems to us, therefore, that a priority for the White Paper should be to improve the flow of heritage advice to those who need it and thus to reduce the incidence of LPA intervention in heritage applications and enforcement work. Ideas we would like to see considered are:
 - ◆ Reaffirmation that heritage should be at the heart of planning and not merely a troublesome adjunct.
 - ◆ The active promotion of heritage places and the catalyst for sustainable development building on each place's strengths and using development resources to reinforce them.
 - ◆ A single central advice database produced collaboratively by the heritage sector.
 - ◆ A clear hierarchy of responsibilities for heritage places with best practice professional standards set for LPAs and applicants in the consents process, a matter the Institute would wish to be involved in and is well placed to advise on.
 - ◆ Unequivocal support for the contribution that LPA conservation service can make to the development process.

- ◆ How appropriate investment in information collection and management and processes within the planning system relevant to heritage care and development, including Historic Environment Record services, might generate a clear case for achieving statutory status.
 - ◆ A Government-wide undertaking to place proper value on public sector (central and local government-owned assets) including heritage-sensitive disposal and renovation policies and restatement of the General Disposal Consents Regulations 2003 where appropriate.
5. In furtherance of this we commend current work and look forward to continuing to participate in the works of and any developments arising from:
- ◆ Heritage 2020.
 - ◆ The Historic Environment Forum's Heritage Protection Reform Group.
 - ◆ Any future collaborative group set up to deal with issues arising from the White Paper in which we might be able to contribute.

PEOPLE

6. It goes without saying that the future of heritage assets and places relies on a vast range of skills by very many people and professional and craft disciplines. The White Paper needs to recognise this with particular attention to:
- ◆ Those directly employed in the heritage sector whose skills need constant improvement for existing practitioners (CPD) as well as to new entrants.
 - ◆ Those not directly employed but who can have a significant impact on heritage and an interest in maintaining heritage value as a component of general property value: the property-owning public and the general property and development industries, through general awareness and stewardship.
 - ◆ Localism is an important mechanism for harnessing community knowledge, priorities, resources and talents. The White Paper should examine how the localism agenda can be harnessed to the benefit of heritage and heritage places.
 - ◆ Work with for example DfE, NHTG and others to address the shortage of heritage craft skills in further education.

FUNDING

7. We realize that public funding is very stretched at present. Nevertheless the cascade of funding responsibilities from Government to Local Authorities and reduced Government grant has placed many with very difficult decisions to make on the future of whole swathes of LA services. We feel that planning and heritage services have not fared well in face of competition for resources with high-profile services such as Children's Services, notwithstanding that heritage management is clearly a statutory function under the Town and Country Planning Act 1990. We think that the White Paper should recognize and address this issue.
8. The resourcing of services that contribute to the public good, such as heritage services, does not sit comfortably within a completely self-funding framework. Regulation of any sort should not be merely farmed out to the regulated as self-policing. This raises significant questions of professional ethics, institutional standards and accreditation. Serious problems have in recent years occurred in other sectors because of this. Core regulation needs to be retained in the public sector and be properly resourced. In doing this the White Paper should recognize

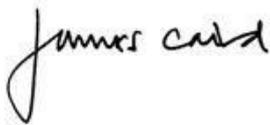
that neither the requirement for heritage services nor the resources to pay for them are uniformly spread throughout England. One-size-fits-all solutions are therefore inappropriate.

9. We remain firmly of the view that the imposition of VAT on works of maintenance to heritage assets is a significant burden on the vary many individual owner-occupiers who look after the majority of the country's Listed buildings and is an unwarranted inhibition to timely maintenance of structures that have been identified contributing to our common inheritance, our sense of place and ourselves as a nation.
10. We think the White Paper should explore evidence from abroad as to how heritage assets might be better treated within the fiscal system. The Institute is particularly interested in the American system of Heritage Tax Credits which we believe could be developed in England so as to be cost-neutral to the Exchequer.

CULTURAL DIPLOMACY

11. It is widely acknowledged that England's cultural heritage has world-wide appeal and contributes greatly to our cultural life and economy. We also have international treaty obligations such as those that relate to World heritage, cultural landscapes and archaeology to name but three. We have outlined the importance of maintaining the integrity of our built-heritage for future generations, but this is an equally important building-block for our hugely important tourism industry. The White Paper should emphasize this.
12. The Nation benefits considerably from cultural work undertaken by the British Council and other bodies. The White Paper should emphasize the importance of this and the desirability in participating in wider cultural bodies and influences such as ICOMOS. England has much to offer the rest of the world in heritage services and in the management of heritage assets and resources with a large number of different models on which others might be based.

Yours faithfully



James Caird
Consultant Consultations Co-ordinator