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BUILDING · CONSERVATION

Making Heritage Work

Heritage 2020 Team
Heritage Alliance

By e-mail

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Dear Heritage 2020 Team

HERITAGE 2020

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.

The IHBC strongly endorses the concept of Heritage 2020 and the intention that this should be a continuing project, with action groups taking various aspects forward and with quinquennial reviews. In particular we like:

- the intention that the paper should be endorsed, adopted and implemented by the heritage sector at large, although we do comment on whether involvement might be more structured.
- the breadth of the range of approaches to conservation that allow a wide range of interests to be followed within the framework as a whole, although we do comment on the need to ensure that regulation and enforcement remain at the heart of heritage protection.
- the document's clarity of purpose and direction, although we do comment that the paragraph structure might more clearly align the details of the key strategic priorities with the section on vision.

Having expressed general support we have a number of points to make.

The tone of the document and the promotion of statutory processes

The paper gives the unfortunate impression that the state of the historic environment is broadly solid and that all that is required are modest changes of direction and new initiatives to make the 2020 vision reasonably achievable. Of course this is far from the truth and the threats to HE are as great now as they have ever been and, many believe, worsening all the while. The document reads rather like a SWOT analysis but without any assessment of weaknesses or threats. We think this needs attention. Otherwise the exhortations for action in the document are unlikely to be realized.

To treat the Government as a partner in the process is beguiling, but if the Government, for its part, views the initiative as a way of achieving a politically acceptable way of ducking its statutory responsibilities, this is inadequate and a more campaigning position is indicated. We think a tabular layout of the statutory and policy obligations of all parties in HE processes would help, and convince those with responsibility (including Governments and LPAs) of what the statutes and regulations oblige them to do. A comparative assessment of England, Scotland and Wales, where outcomes have differed, might help to focus attention on what is required.

There is a perceptible current trend in heritage policy to emphasise and promote new ways of delivering heritage protection. Clearly we do not disagree with this in principle, but the trend is tending to give the impression to the uninformed that somehow this represents a relaxation of standards in heritage protection in favour of more subjective interpretative and implementational criteria. An example of this is at paragraph 7.12. We do not think such an impression is desirable as it appears to be moving away from the long-standing conservation principle of retaining heritage evidence wherever possible and adopting the precautionary principle in cases where there is doubt. To draw back from this position is to risk the loss of heritage character which future generations might regret.

So we think that the paper ought to be quite forthright in expressing the desirability that heritage should be protected and not lost, that cumulative loss can be as damaging as one-off loss and supporting the statutory processes in ensuring the proper examination of facts and issues on a case-by-case basis.

We continue to be concerned about the increasing use of the expression "constructive conservation". This reinforces the impression of changed standards because it implies that there was something wrong with "conservation" as defined in international conventions such as the Burra Charter. For many years the sector has striven to differentiate between positive and negative implications in conservation by contrasting "conservation" (putatively positive) with "preservation" (putatively negative). The plain meaning of these words seems to us to have more clarity in the exposition of the issues that the expression "constructive conservation" produces.

The term "constructive conservation" is most in danger of hijacking in the almost totally ill-informed "green deal" and energy conservation sector. The "resilience" to climate change referred to in paragraphs 2.5 and 4.19 needs to lead to appropriate techniques being used and this needs to be expressly stated at every opportunity. There is nothing so non-green as the loss of embodied energy which occurs with the replacement of perfectly good older structures rendered uninhabitable or unusable by improper repairs, maintenance and other intervention.

Thus we think section 4 should be more forthright in promoting the management, conservation and protection of heritage in its own right, especially for the most valued and susceptible heritage and setting a base-line for practice standards in the unregulated historic environment. Examples of where the text needs reinforcement include:

- Paragraph 1.6 - "...by means of policy and practice **and regulation...**".

- Paragraphs 2.7 and 3.9 – We don't like the expression "risk-adverse" at 2.7 because we don't think the paper should give the impression that innovation is preferable to proper risk assessment. The way this issue is handled in 3.9 is better although perhaps "sophisticated" would be a better word in the heading than "strategic" as risk-assessment must, by its nature, be generally case-specific.
- Paragraph 3.5 – While we agree that heritage "experts" do not have a monopoly of understanding, we are concerned that this paragraph might give the impression that an alternative "perspective" on a heritage asset might somehow trump the qualities for which the asset was designated in the first place. We think that the document can be positive about the contribution made by wider communities of interest without being negative about the very necessary role of professionals which should be more prominently expressed.
- Paragraph 3.5 and elsewhere – The document widely acknowledges the essential role of heritage professionals, although the need, in statutory processes, to have "special regard", the "great weight" urged by the NPPF and the specific ss16, 66 and 72 requirements on decision makers does indicate the need to promote more strongly the need for further develop the breadth and depth of professional expertise. This is made all the more urgent by the decline in professional resources, caused by both cuts and demographics, likely to continue during the currency of Heritage 2020.
- Paragraph 4.2 deals with designation. We agree with the point made but the fact that heritage is undesignated does not mean that it is unimportant should be made too. This is a point frequently endorsed by planning inspectors in decisions favourable to undesignated assets.
- Paragraph 6.10 – This is, perhaps the most important feature of the document; for, without a sustainable mechanism for heritage protection at LPA level, the standards of HE conservation envisaged in the statutes will become a thing of the past. At the moment the issue, politically, is seen by some as the bleating of a sectional interest in the face of more pressing demands for resources. Heritage 2020 needs to address this issue in a more forthright manner. If the suggested support for HE in the built environment sector exists, the document needs to have a much clearer analysis of how this support can be harnessed.
- Paragraph 7.12 – where a statement of fact about developing interest seems to emphasize the points we have made about diminishing the essential role of regulation and enforcement.

Public Engagement

There are two aspects we would like to comment on here. Firstly, while we agree with the need to harness, co-ordinate and improve upon the widespread public appreciation and concern for heritage, the paper does not recognize sufficiently the enormous contribution to heritage protection processes by formally constituted third sector bodies such as civic societies, building preservation trusts and the statutory amenity societies. The paper recognizes these by generalization in the priorities section but this is insufficiently referenced we feel.

Secondly, while public concern for heritage is widespread, the also widespread converse of this is indifference and even antipathy. Recognition of this reinforces the arguments in favour support for continuing statutory regulation and intervention, but, it seems to us, that there is also a need for advocacy effort as well.

Capacity building

We endorse the general approach on this in paragraph 7.17 subject to our comments on implementation below although the fact that an enormous amount of information is

already available should be recognized by starting bullet point 1 with the words "Continuing to...". However we have concerns that the role of heritage professionals is inadequately handled. Section 6 is quite good in this respect and the emphases made there should receive recognition in 7.17.

We do not fully understand what is intended to be meant by the statement that professionals will be cross-disciplinary at 2.7. We think this might reinforce the view currently prevalent in some local authorities that a junior planning officer is capable of taking properly assessed decisions on heritage matters. We think that this point might be best omitted.

We think we support the views expressed at paragraphs 6.14 and 6.15, but are not entirely clear what "encouraging the specification of accredited professions" means. We think, for sector-wide clarity, this should be set out more plainly.

A major omission from Heritage 2020 is any assessment of the strategy's resilience. It seems to us that the fluidity of the current position, in terms of both structures for Governance and resources, is such that there is a strong possibility that serious review will be required far sooner than 2020 and that the document should allow for this.

Resources

We think there needs to be some reinforcement of the few references to resources in the paper. We think there should be a more structured approach to this which builds on the economic contributions of heritage set out in paragraph 4.5 including:

- The need for heritage to be valued and have value wherever possible, but for economic value not to be a sole criterion nor for the lack of resources to imply, in any way, a diminishing of importance.
- Promotion of the idea that sensitive re-use can be a key to this and that investment in heritage should be the first-stop approach. Perhaps 4.5 could be modified in this respect.
- New-build continues to have financial advantages over heritage investment and the sector should continue to point this out even though the Treasury is unlikely to listen.

Helping this to happen

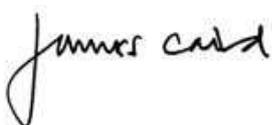
At paragraph 7.7 the term "Government" is capitalized which normally denotes central Government. We think the point is a more general one and should be extended to all those with statutory duties including local planning authorities.

We implied in opening that we thought paragraph 7.17 to be insufficiently structured. We think an indication of delivery mechanisms might be appropriate, although we appreciate that the document is not an implementation plan.

Conclusion

We hope these comments are helpful. As mentioned in opening we are enthusiastic about the opening up and promotion of the sector in the way envisaged by the paper and wish to be involved in its further development, implementation and review.

Yours sincerely



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