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**Dear Sir**

**Consultation on Draft Historic England Industrial Heritage Strategy**

The Institute of Historic Building Conservation 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.

IHBC welcomes the opportunity to comment on the Historic England Industrial Heritage Strategy and agrees that it is needed as Listing or designation is not enough on its own to protect industrial Heritage.

The Institute's comments on the consultation document are as follows:

It is surprising that the strategy does not refer to the International Committee for the Conservation of Industrial Heritage (TICCIH) the World specialist organisation representing Industrial Heritage (IH) and special adviser to ICOMOS on Industrial Heritage especially since the international importance of the UK's industrial heritage is cited at the outset. Nor is there any reference to the Nizhny Tagil Charter for the Industrial Heritage, July, 2003 originated by TICCIH which has application worldwide; The Nizhny Tagil Charter provides an internationally accepted

definition for Industrial heritage; a set of Values for Industrial heritage; a justification for the importance of IH; the need for maintenance and conservation of IH and what that entails; the need for education and training in this area to continue to develop expertise, and information concerning the presentation and interpretation of these sites. Perhaps it is intended to include reference to that Charter in the 'Historic England Advice Note on Industrial Heritage' which is referred to at para 2.3.

We note that the Scope for the definition of Industrial heritage has been followed from an English Heritage (now Historic England) 2011 project c.1750 to date with an emphasis from the 'Industrial Revolution' to the onset of the First World War.<sup>1</sup> The Strategy uses the definition for Industrial heritage which emanated from an earlier document of HE, and it does not use the internationally agreed definition from the Nizhny Tagil Charter which is surprising. The Strategy document does not refer to the Joint ICOMOS-TICCIH Principles for the Conservation of Industrial Heritage Sites, Structures Areas and Landscapes, the 'Dublin Principles'<sup>2</sup> the agreed best practice guidance at international level for IH. Those principles give a very detailed definition of IH at Article 1. *'The industrial heritage consists of sites, structures, complexes, areas and landscapes as well as the related machinery, objects or documents that provide evidence of past or ongoing industrial processes of production, the extraction of raw materials, their transformation into goods, and the related energy and transport infrastructures. Industrial heritage reflects the profound connection between the cultural and natural environment, as industrial processes – whether ancient or modern – depend on natural sources of raw materials, energy and transportation networks to produce and distribute products to broader markets. It includes both material assets – immovable and movable –, and intangible dimensions such as technical know-how, the organisation of work and workers, and the complex social and cultural legacy that shaped the life of communities and brought major organizational changes to entire societies and the world in general.'*

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<sup>1</sup> It includes the extractive industries, processing and manufacture, public utilities and telecommunications, and all forms of transport. Industrial landscapes, buildings, structures and archaeological remains can be found throughout England in both urban and rural areas, and range from large-scale factories to the more humble craft-based workshops. Rural sites such as wind and water mills, and maltings, are within scope, together with those associated with armament, munitions and explosives manufacture (including naval dockyards), whereas defensive sites are omitted.

<sup>2</sup> Acknowledging the particular nature of the industrial heritage and the issues and threats affecting it as a result of its relation to the contemporary economic, legal, cultural and environmental contexts, ICOMOS and TICCIH wish to expand their cooperation by adopting and promoting the dissemination and use of the following Principles to assist in the documentation, protection, conservation and appreciation of industrial heritage as part of the heritage of human societies around the World.

The strategy does refer to the large number of 'industrial World Heritage Sites in England such as the Ironbridge Gorge, Derwent Valley Mills, and the Cornwall and West Devon Mining Landscape' but it does not refer to World Heritage UK (WHUK), notwithstanding the fact that WHUK is the only organisation focused solely on World Heritage in the UK and is involved in capacity building activities and skill development in the context of UK World Heritage Properties many of which celebrate industrial heritage.

Whilst the document refers to the 2018 report of the APPG on Industrial Heritage it does not adequately explain how one of the predominant concerns referred to in that report, which is skills, will be provided at Local Planning Authority level. It does refer to the establishment of Industrial Heritage Networks across England to share knowledge, expertise and encourage collaborative working, together with other possible measures to aid recovery and strengthen resilience. These initiatives are welcomed.

Although there is a section related to Planning and Conservation there is nothing under the actions in respect of promoting the adoption of local Plan Policies, where appropriate, which could be tailored to suit the industrial heritage resources within individual local authority boundaries. Although HE proposes to champion heritage assets by providing expert advice (2.1), greater protection might be given to assets through the inclusion of 'industrial heritage' policies in local plans, so some advice on how such policies could be formulated and worded would be useful as the wording needs to be specific to a particular locality. Addressing the issue of 'Prior Notification of Demolition' applications as a means of circumventing the policies in a local plan also needs to be addressed but this is a much wider issue.

IHBC still has concern for the lack of expertise at Local Authority level to address the knowledge requirements of putting the strategy in place. Professional skills are needed at LA level and we maintain that there is a need for ongoing capacity building and training. IHBC questions whether the provision of Industrial Heritage Support Officers and networks will be enough to adequately support and upskill the acknowledged lack of expertise within Local Authority professional staff. This is also relevant to the commitment in the strategy to providing expert advice through statutory casework and other related work in negotiating the sustainable reuse of redundant historic industrial buildings which is set out in the report (the proposed solution being : 'Historic England engaging with local authorities, local economic partnerships, development sector, owners and others'). This can only be a fully workable solution if the partner bodies identified have both commitment and suitable expertise. IHBC considers that it is essential that both local authorities and Historic England are

resourced sufficiently to advise on optimum solutions for the conservation of industrial heritage.

IHBC welcomes the commitment in the strategy to develop skills training in key aspects of industrial heritage. IHBC notes positively the intention to develop with professional bodies a standing forum dedicated to industrial heritage strategy, promotion and progress and we support the creation of such a forum and are willing to be involved in the activities of that forum.

IHBC welcomes the commitment in the strategy to working with sector partners to identify and address other knowledge and skills gaps and by developing and implementing joint initiatives. However it is unclear from the strategy how the proposed need for people to take responsibility for designated industrial sites is to be implemented. Perhaps HE could look to partnership with other organisations in addition to IHBC such as TICCIH and World Heritage UK.

IHBC agrees that the societal value placed on Industrial Heritage is not widespread enough or properly and favourably engaged with a diverse and inclusive enough outreach approach and the vision set out for the strategy is a positive step. IHBC agrees with the need for inclusivity and diversity concerning Industrial Heritage in the context of improvement of the promotion of intangible heritage by volunteers.

Yours sincerely

Fiona Newton

IHBC Operations Director