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Dear Sir

**Consultation on Historic England's Draft Our Local Authority Strategic Framework.**

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.

We are very pleased to have the chance to comment on the consultation document. The Institute's comments are as follows:

Clarity about Historic England's engagement with Local Authorities and the services and resources to be provided would be valuable provided that the objectives and outputs to be achieved are made explicit given that Historic England must work within its current budget. However, throughout the document there appears to be an implicit assumption that both Historic England and local authority resources will remain "*steady-state*" i.e. either unchanging or at least not in decline. This strategy seems to lock them into a rigid 10-year scenario which does not have the requisite flexibility to permit a change of course in response to unforeseen circumstances. This inflexibility already looks questionable in the light of the impact of COVID-19 both on the future of public expenditure generally, and on specific initiatives - for example the future of High Street Heritage Action Zones, when conventional retailing may emerge changed forever after the pandemic.

IHBC is also concerned that the document appears to be dangerously oblivious to statutory and strategic climate change challenges. These will have massive and wide-ranging impacts on the historic environment during the next 10 years. The Government has set its statutory Net Zero commitment by 2050, but 2030 is the target for the Private Rented Sector Regulations statutory retrofit requirements, for the Government's Clean Growth Strategy for all buildings, and for many local authorities' Net Zero commitments, as well as being the deadline demanded by many in the environmental movement. The combined effect over the timescale of this document, if not sensitively handled, could be the greatest single threat to the built heritage in our lifetimes. This crucial strategic challenge requires a combination of strategic intervention by Historic England (including engagement with the Local Government Association), clear guidance, and enhanced conservation officer capacity at local level.

IHBC questions whether the proposed capacity building training at local level will be enough in circumstances where Local Authority services are already very stretched. Where will the trainees come from? More and ongoing training to build capacity will be required at local level and it is anticipated that more personnel will also be required to enable the larger vision or framework to be implemented. The role of Local Authorities is being extended constantly without ensuring capacity of new personnel with appropriate knowledge and skills to implement the proposed tasks being put in place. Pressure on the large spending local authority statutory services will inevitably squeeze the resources of smaller ones such as heritage services. Local Authorities coming under stress as a result of the increased requirements and smaller budgets has been well documented by IHBC and other bodies.

The capacity requirements implicit in Historic England's partnership vision need to be addressed. Many of the items identified in this strategic framework have been suggested before and the IHBC would like to know how Historic England proposes to ensure things which have not been successfully implemented previously can be done now? Whilst the Outputs listed are generally supported it would be helpful to show the genesis of these initial aspirations. The Framework suggests that, especially through the regions, Historic England will develop its liaison with local authorities. The informal communication and personal connection between local authority conservation staff and Historic England staff, especially in the regions, is vital. These links have been beneficial to both sides but IHBC members believe these are now more tenuous than in the past and this dilutes the potential for successful decision making by those engaged in the system.

There is limited reference to development management or related strategic issues among the outputs. Given the importance of development

management and the limited resources available, there needs to be a clearer strategy for development management engagement. For example the standard 'no comment' letters are often interpreted as meaning Historic England is content with the proposal, when that might not actually be the case.

There should surely be some mention of the Historic England Charter in the framework as it sets out a starting point for a future strategic framework? Each Historic England region has sixteen defined roles, but the document does not indicate which are statutory, which are the most important; how are the resources to be allocated, and how is this to be staffed? Crucially, as none of the outputs appear to be measurable this raises the question as to how anyone might evaluate success (or failure) either on an interim rolling or final basis? We believe that Historic England should be thinking about different resource scenarios for delivery of specific tasks and make these explicit. For example, what would a 20% resource cut look like?

The extent of Historic England's input on statutory casework needs to be far more explicit, highlighting the implications for the quality of Local Authority development management, decision-making including quality assurance, compliance and enforcement. IHBC understand that Historic England needs to address as a priority the need to meet controversial development proposals which will have a negative impact on the built environment and to have enough staff with proper qualifications to do it. It is only in this way that HE can provide adequate support for the work of Conservation Officers trying to preserve their district's heritage. Historic England seems to be already retreating from some casework because of declining resources.

*"Advising on applications for planning permission, listed building consent, scheduled monument consent ..."* is one of 27 priorities yet there is no mention of development management in the outcomes, either within 3 years or by 2030. We believe that 27 is far too great a number, all of which appear to be accorded the same weight. Consequently, the framework reads like a shopping list and one might ask which are not priorities? The timeframes for specific actions need to be more visible preferably at the start of the document. The priorities should be listed as high, medium and low as not all will be achievable.

There is little recognition of the positive work of community groups such as Building Preservation Trusts, Community Interest Companies, Charitable Incorporated Organisations etc., that make a significant contribution to creative conservation, particularly re buildings at risk, and how they engage (or not) with local authority priorities. Some community organisations have substantial property portfolios. Some have been the means to turning around declining historic areas. Historic England needs

to demonstrate that it understands the opportunities such organisations bring to their communities but equally demonstrate an understanding of the constraints that they work under. The commercial reality should be recognised and supported.

The approach to addressing sustainability and the challenges of climate change in this document is inadequate. We have previously noted the high-level strategic issues. The Government's handing over of responsibility for retrofit to the construction industry (in the form of the Each Home Counts Review) made the challenges even more difficult. The new Retrofit Standard PAS 2035:2019, in combination with British Standard BS 7913:2013, provides a basis for managing some of the conflicts between climate change and historic buildings. But this can only be achieved if the right skills and informed advice are available. Local authorities are the key, through their own climate change commitments, through what they require for their own retrofit projects, and in the advice they give to others. Engagement with this vital area of local authority activities should be a key part of this draft document, including with the Local Government Association as the collective body for local authorities.

The document fails to acknowledge, let alone dovetail BS7913 or any of the excellent published resources such as urban design guides and other relevant documentation. IHBC urges Historic England to seize the opportunity of this document to prioritise promotion of guidance and best practice advice widely through local authorities and the LGA. This should include urging all authorities to purchase (and make available to conservation staff) PAS 2035 and BS 7913, plus promoting the excellent technical research and advice by Historic England and sector partners which has not yet reached anything like the audience needed to achieve significant change. In particular, the guidance produced for Bristol by the Sustainable Traditional Buildings Alliance (supported by Historic England) under the title "A Bristolian's Guide to Solid Wall Insulation" provides a template which could be reproduced, suitably tailored to suit local character, construction and climate, for all local authorities.

IHBC believes that the designation of Heritage Champions has largely failed in practice and they do not influence important decisions. The role is totally dependent on the inclinations and influence of the individual champion. Perhaps Historic England could indicate how many there are and how long such posts have been established (bearing in mind the short tenure of many post-holders beyond one electoral cycle) if such posts still exist and if so, report what they have actually achieved in office?

IHBC believes that what Historic England proposes in this document is insufficiently focussed, and potentially dangerously oblivious to the key

challenges of the next ten years. The document in itself is bland but behind it could be a winding down of the development management function of Historic England. Overall in the light of the foregoing, IHBC considers this document requires significant recasting to be relevant, effective or influential regarding the next ten years.

Yours sincerely,

Fiona Newton  
IHBC Operations Director