



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

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Dear Sirs

THE 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.

In general, the Institute supports the Plan which it sees as being well-considered and realistic in the current economic climate. We do, however, have a number of comments:

- The NHPP has substantial similarities in principle and aspiration to the various action plans associated with the research produced by the National Heritage Training Group (NHTG) over recent years, not least the wide-ranging Skills Action Plan in the Built Heritage Sector Professional Report of 2008:

(See <http://ihbconline.co.uk/newsarchive/?p=32>
& <http://ihbconline.co.uk/newsarchive/?p=330>)

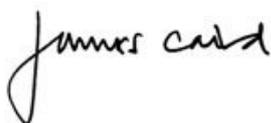
The NHTG's focus on the construction sector complements the NHPP's stronger focus on designation, protection and understanding. With the partnership priorities in the NHPP, and its proposed allocation of funding to areas where it might make most difference, the NHPP should give priority to delivering its wider objectives in parallel with the NHTG Action Plans. Both IHBC and NHTG, as well as the wider interest represented in the Action Plans, are keen to engage in detailed dialogue with English Heritage on how best to progress this.

- Whilst we support the outline delivery framework set out at paragraph 1.3, we have reservations about the weight of resources to be assigned to some of the Measures

required to achieve this and are very unclear as to how the detail in the Plan will deliver the hoped for outcome of delivering consensus.

- With reference to paragraph 1.5, we are not entirely clear the extent to which the proposed framework for working with others may be undermined by reductions in the resources available to potential partners, whether public or third sector, which are increasingly beginning to bite.
- In particular we are concerned that the majority of priorities are concerned with understanding heritage, maintaining it and managing its interpretation and public access. There is little concerning the management of change from which, we would argue, the greatest potential negative impacts are likely to emanate.
- We support the prioritization framework set out at paragraph 2.3, but are concerned that this could leave a very substantial proportion of heritage assets with a low degree of priority. In view of the likely transmission of responsibility for heritage management and development control under the Localism Bill, the Institute would like to see recognition expressed in the Plan of potential conflicts within these priorities: for example that heritage not valued locally may become more threatened as a result.
- Nevertheless, we support the empowerment of local communities but do question the relatively low allocations to the relevant Measures 5A4 and 5B2 for the support of local protection and planning processes.
- Bearing in mind the the Government's Localism agenda is in its infancy, the Institute believes that a Plan that allocates resources for a 4-year period should have more contingency built into it. The allocation to Measure 1, Foresight, seems, at under £500k over 4 years, to be light.
- Whilst we understand that new priorities need to be forged in the light of current circumstances, we are concerned that several areas of threat have been allocated a nil resource. It is particularly concerning that these issues are highly likely to be subject to increasing threat through the application of Government policy in other areas, particularly those to combat climate change. These are:
 - Measure 2A3: Permitted development and piecemeal change in conservation areas
 - Measure 2D3: Energy generation impacts
 - Measure 4G2: Wetlands, riverine and waterlogged assets
 - Measure 5B4 Strategic proactive landscape planning support

Yours faithfully



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