



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

Crowded Places Team
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Dear Sirs

WORKING TOGETHER TO PROTECT CROWDED PLACES AND

SAFER PLACES: A COUNTER-TERRORISM SUPPLEMENT

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.

WORKING TOGETHER TO PROTECT CROWDED PLACES

The Institute supports the emphasis on proportionality at paragraph 14 and elsewhere as some counter-terrorism measures (traffic control measures; vehicle barriers; blast resistant measures; CCTV installations) have the potential to be very disfiguring of historic buildings and townscape. We are concerned that there is no specific reference in the document for the need for physical works to meet also the demands of quality of place and protection of historic assets.

The Institute is concerned about how this area of policy can be properly dealt with as a material consideration in planning terms without clearer guidance on the scope of potential terrorist targets. If the assumptions of vulnerability are drawn too wide, the messages in relation to the highest priority cases may be lost.

However, we appreciate the strategic nature of the document and that the detailed guidance for planning and historic environment practice is to be contained in *Safer Places: A Counter-Terrorism Supplement* which we think is excellent. We think it might be appropriate for this to be more highlighted than a relatively cursory reference in the Ministerial Introduction and paragraph 3 of Chapter 6; and to be more immediately accessible with reference to an active download location.


SAFER PLACES: A COUNTER-TERRORISM SUPPLEMENT

As stated above, the Institute thinks this document is excellent, showing just the right balance in relation to environmental and historic issues. We were pleased to have been given the opportunity to participate in the steering group. But we do have concerns about how the document is to be put into effect in the development management process.

Paragraph 17 states that the document is capable of being a material planning consideration and that LPAs must have regard to it. But it is not clear to us how the proper interests of proportionality can be exercised when the degree of risk may be classified information as is implied elsewhere in the document.

We think a resolution of this point is essential.

Yours faithfully

A handwritten signature in black ink that reads "James Caird". The signature is written in a cursive style with a large initial 'J'.

James Caird

Consultant Consultations Co-ordinator