



ENGLISH HERITAGE

## National Heritage Protection Plan

### Interim Plan – December 2010

This version of the Plan has been drafted following consultation with interested parties in June 2010 and has been further adjusted following English Heritage's settlement as part of the Comprehensive Spending Review. Comments received by 14 February 2011 will inform the final version of the Plan which will begin operation in April 2010. Once the delivery of the Plan has started there will be an opportunity each year to inform the revision of the priorities.

Please complete the questionnaire and return to: [nhpp@english-heritage.org.uk](mailto:nhpp@english-heritage.org.uk) by 14 February 2011.

<b>Name Noël James on behalf of Historic Towns Forum</b>	<b>Organisation Historic Towns Forum</b>
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(Please give the name of the organisation if you are formally responding on behalf of that organisation)

**How much do you agree or disagree with the following statements:**

**Q1.** The Plan is an improvement on the earlier draft that was circulated in June 2010?

Strongly Disagree					Strongly Agree
1	2	3X	4	5	Don't know

**Q2.** The Plan's priorities are clear.

Strongly Disagree					Strongly Agree
1	2	3	4X	5	Don't know

**Q3.** The Plan largely addresses the priorities for the historic environment.

Strongly Disagree						Strongly Agree
1	2	3	4X	5		Don't know

If the answer to Q3 is less than 4 or Don't know:

**Q4.** Can you briefly explain what you think is missing from the priorities?

Although we have answered 4 to Question 3, we still feel there is room for improvement in the priorities.

We feel there should be a stronger connection to current legislation – especially in terms of a stronger understanding of the likely implications of the Localism Bill, Schedule 12, and the danger to listed buildings through Neighbourhood Development Orders (we realise though that this information was not fully available at the time of publication of this iteration of the NHPP).

In addition we feel that the priorities should be guided by the level and certainty of change to historic places that could harm or destroy unknown/incompletely understood historic assets that could be significant. The process of protection would also benefit from improvements in efficiency, but protection is not only designation alone. Designation should also be the recognition of places identified as being important and therefore worthy of protection through regulation and control imposed by the planning system. In the latter part of this process it is the local planning authorities that take the lead and incur costs. This should be adequately acknowledged in the Plan, and resourced in the real world. Without central and local government commitment to adequate resources for this critical stage of protection the Plan is unlikely to make much difference. As an umbrella organisation for Local Authorities involved in planning, the HTF cannot emphasise this point strongly enough.

Furthermore, while it is noted that there is an improved focus on managing change from the last iteration of the Plan, it is still felt that the emphasis is largely on understanding, research and maintenance, rather than managing change, delivering change and regeneration. There is a danger that research and understanding could focus on researchers' areas of interest rather than on the actual needs of the heritage communities outside English Heritage.

**Q5.** Do you see activities identified in the Plan which are complementary to work undertaken or proposed by you or your organisation?

YesX	No	Don't know
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**Q6.** If Yes, are there ways in which we could collaborate to produce more effective results? Please use the relevant activity codes, such as 2D3, if possible.

If No, what changes could result in joint working? (This could be changes in the Plan, your organisation's resources etc.)

If Don't know, what further information would help you come to a view on whether there are possibilities for future alignment?

- 1A Foresight – HTF is well-suited to work with EH across this agenda where it regards the built environment
- 2A2 - Resolving Impact of Carbon Challenge on Built Heritage – we could collaborate on research and effective case studies – this is an area of HTF focus and expertise
- 2A3 – Permitted Development and Piecemeal Change – future collaboration would be desirable
- 2B2 – Neglect – our networks could provide evidence for this exercise
- 2B2 – Heritage Crime - our networks could inform this exercise
- 2C1 – Major Environmental Threats – we are particularly interested in the climate change element of this measure
- 2D3 – Energy Generation Impacts – we would be able to provide case studies and collaborate on research when resources are available
- 2E1 – Heritage Management, Conservation and Craft Skills Shortages – we are especially keen to find ways to provide heritage/conservation internships focusing on appropriate skills, as well as facilitating training courses in these areas and would be interested in partnership working on this agenda
- 2E2 - Capacity Loss in Local Authorities – this is an area in which we are well-placed to provide training
- 4A - Urban and Public Realm – this is our main area of focus and expertise – we would be particularly keen to collaborate on 4A1 – Historic Towns and Duburbs, and 4A4 – Public, Civic and Communal Buildings. We could provide evidence, research and training.
- 5B1 – Heritage Partnership Agreements and Model Management Plans - we could help

here with co-ordination of stakeholders and guidance where this relates to Historic Towns

5B2 – Underpinning Local Planning Processes - this is one of the main focuses of HTF and we are currently planning and delivering work around the Localism agenda within the heritage context – this is an area where we would especially be keen to collaborate. We could aid with research, training, guidance, support and delivery.

5C1 – Enhancing the Capabilities of Historic Environment Records – we could provide support to Local Authorities where this relates to planning and conservation

6A1 – Heritage and Local Planning – we can help here with training and dissemination

6B1 – Decision Making in the Planning Process – this is an area where we can provide training, guidance and support

**Q7.** Do you have any suggestions for how the sector might take forward the Activities English Heritage is currently unable to undertake, but which are still recognised as important? These are currently:

- 2A3 Permitted development and piecemeal change
- 2B3 Recreational activities
- 2C2 Water management directive impacts
- 2D3 Energy generation impacts
- 4C1 Sport and entertainment buildings and landscapes
- 4G2 Wetland, riverine and waterlogged assets
- 4G3 Ploughzone archaeology
- 5A5 Developing approaches to significant but non-structural assets
- 5B3 Developing marine heritage management structures
- 5B4 Strategic proactive landscape planning support

(Note that not all activity will necessarily cease in these areas, but specific budgeted activities are not planned).

2A3 – Permitted Development and Piecemeal Change – through partnership working – this is an area HTF could be involved with

2D3 – Energy generation impacts – ditto

-It might be possible to bid for funding in partnership for activities and research in these areas; in addition to would be wise to identify and target bodies that are already working in these areas to establish whether a joint agenda could be agreed to aid delivery without further cost.

**Q8.** Do you have any specific suggestions of ways in which we ensure that collaborative working between a) partner organisations and b) local communities will deliver the aims of the NHPP?

HTF would like to see discussion with both partner organisations and local communities about shared priorities and ways these could be delivered in order to deliver the aims of the NHPP. Perhaps a series of heritage summits could be organised at different levels and on appropriate subjects to achieve this – for example recent events held by CADW and Historic Scotland in conjunction with the Welsh Assembly and Scottish Parliament have provided profile and allowed communities and organisations to engage across heritage priorities. EH could identify heritage and community bodies already engaging or preparing to engage in such activity (HTF is one) and agree joint action plans.

**Thank you for taking the time to complete our questionnaire.**