

Historic England (HE) Industrial Heritage Strategy Consultation.

The [Heritage Alliance](#) is England's coalition of independent heritage interests. We unite more than 160 organisations which together have over seven million members, volunteers, trustees and staff. We sit on the Government's Heritage Council and Heritage Working Group, and on the sector's Historic Environment Forum.

We welcome the draft Historic England Industrial Heritage Strategy and the collaborative approach Historic England is taking through engagement with the sector. We agree that Industrial Heritage has great potential to improve **health and wellbeing**, address climate change through the **re-use** of historic industrial buildings and play a role in the government's **levelling up** agenda.

We welcome the draft Historic England Industrial Heritage Strategy and the collaborative approach Historic England is taking through engagement with the sector. We agree that Industrial Heritage has great potential to improve health and wellbeing outcomes in communities, and play a role in supporting the government's levelling up agenda across the country. For example, The Grantham Canal Heritage Initiative transformed a section of the canal from dereliction to a living waterway by restoring valuable heritage assets. This project had a demonstrable positive impact on volunteers, and more details can be found in our [Heritage, Health and Wellbeing report](#). Aligned with the role of Industrial Heritage in wellbeing, is its potential to integrate with creative practice and programming. Heritage **plays a key role in underpinning and inspiring creativity**. Case studies from our [Inspiring Creativity report](#) exemplify this and are covered further under the 'sustainable reuse' section. Finally, Industrial Heritage has an important role to play in addressing climate change through the re-use of historic industrial buildings.

Levelling up is a priority of the Government; the [Levelling Up Prospectus](#) states that '**upgrades in local heritage sites strengthen the local economy and build civic identity**'. Ex-industrial areas are mentioned numerous times in the prospectus with a recognition that the fund is '**especially intended to support investment in places where it can make the biggest difference to everyday life, including ex-industrial areas**'. This provides an excellent opportunity to align this strategy with a key government priority, particularly as it spans many of the Strategy's issues.

The heritage sector has often struggled to illustrate its economic value using current economic models, so we welcome Historic England's recent commissioning of Simetrica Jacobs and Nesta to produce research on taking a '[culture and heritage capital approach](#)', establishing the economic value of local heritage sites using an alternative method detailed [here](#) to more accurately encompass the full value of heritage. The research confirms what we instinctively know, that people value their local heritage and are willing to pay to maintain local heritage in good condition.

However, we have a number of suggestions and concerns to raise on behalf of our membership in response to the consultation which are outlined below, with specific 'comments on identified priorities' and cross cutting comments under the 'suggestions on any significant gaps or omissions in coverage' section, such as broadening the scope of the strategy.

Comments on the identified priorities

1. Overall, we are content with the identified issues and themes and particularly welcome the inclusion of transport as a theme. There are some issues and themes we have provided comments on below and the gaps and omissions that require addressing have been covered in the second section of this response.

Issues:

Protection

2. There is no link in this section to the findings of the HE Commissioned [Saunders report](#) on listing which found that Industrial Heritage sites were under-represented. There should be recommendations in the strategy on how to address this under-representation.
3. Covered further under 'Working Heritage', we would welcome a widening of the scope of heritage being protected to include operational assets.

Planning and Conservation

4. In relation to the point 'Changes to the planning system itself may create additional challenges', we would like to particularly highlight permitted development changes over the last few years which resulted in a demolition loophole for non-listed buildings. Recent changes to permitted development have allowed the demolition of housing and offices, if they have been left vacant for 6 months, and can be replaced by housing, without a full planning application being made. We firmly believe that demolition should be fully controlled by planning permission (and ideally attract VAT), so that environmental and sustainability factors can be assessed as well as the impacts on local infrastructure. There is presently no protection for locally listed/undesigned heritage assets that are located outside conservation areas. Excluding them from demolition through permitted development would help protect those assets that contribute to local character or have some other local or national significance (particularly in the absence of interim protection for assets under consideration).
5. Further importance needs to be given to the potential impact that an expansion of permitted development rights and a zoned approach to protected and growth spatial areas could have on redundant buildings in brownfield sites. A more proactive approach to articulate significance, as well as the sustainability, of reusing and retrofitting standing buildings, is essential, in relation to points 8-11.
6. Also, in relation to planning, we believe that inadequate heritage and planning resources in local authorities are a critical limiting factor in the whole planning system. Often sites of Industrial Heritage interest are only identified late in the planning process because no one who understands Industrial Heritage visits the site until the planning consultation stage. The lack of resources causes uncertainty, delays, extra costs to developers and owners, loss of parts of our irreplaceable heritage, and failure to deliver sustainable development.
7. If the planning system is to deliver sustainable development and effective decision-making, it needs to be structured efficiently and resourced appropriately. As long ago as the [2004 Barker Review](#) and the [2010 Penfold Review](#), inadequate heritage and planning resources in local authorities was seen as a critical limiting factor in the whole planning system. Since

then, resources have been reduced by a further third, and these concerns have increased greatly.

Sustainable reuse

8. Many former industrial sites as robust buildings offer the opportunities for conversion to new uses. Reuse has important environmental benefits, as [Historic England research](#) has shown, and the environmental points could be further highlighted in the strategy. Net zero carbon emissions sustainability targets for 2050 (2030 in some local authorities) mean that retrofitting standing structures should be a key tenet of a sustainable built environment. Opportunities for this industrial strategy to tie in with such wider government priorities should be capitalised on.
9. We welcome Historic England's support in advocating for fiscal incentives such as the case for change for VAT on maintenance and repair to bring it to parity with VAT on new build. This would both stimulate the economy, as [FMB research](#) has shown and release less carbon into the environment as [Historic England research](#) has shown.
10. In addition, Industrial Heritage buildings can provide engaging spaces for the creative industries; heritage plays a key role in underpinning and inspiring creativity as our [Inspiring Creativity report](#) showcases. Two examples of Industrial Heritage sites being used in alternative ways are Cromford Mills as a site of community engagement and the Cornwall and West Devon Mining Landscape undertaking a successful partnership with Golden tree Productions to deliver The Man Engine Project, which was recognised by the National Lottery Heritage Fund as the 'Best Arts Project' in 2017.
11. Finally, although the reuse of buildings is a very welcome addition to the strategy, it is not viable for all heritage assets and this should have greater recognition within the strategy. Where appropriate, equal consideration should be given to what can be done to support the continuation of original uses where possible as this will cause the minimal amount of harm.

Charitable Trusts/Social Enterprises

12. The Heritage Alliance has many members that fall into this category and have experience of rescuing and operating Industrial Heritage sites. They could help Historic England in giving advice and support to new groups wanting to save and conserve sites.
13. Organisations of this type are widely found in the transport sector and HE should expand the coverage of the strategy to explicitly include transport particularly where the transport heritage operation is directly or indirectly helping to sustain historic buildings and structures. This is true in many small and medium scale ports where port buildings and structures are crucial to and supported by continuing heritage operations.

Industrial Sites preserved as Heritage Attractions

14. We welcome the actions in this area, Industrial Heritage sites are expensive to run and depend on volunteers and visitor generated income/donations, both of which have been stopped or severely limited (distancing caps visitor numbers) throughout the lockdowns.
15. Many sites use the income generated for maintenance and with significantly reduced visitor income over 2020/21, maintenance may suffer and have long term detrimental impact on the condition of assets. This is in addition to the backlog of maintenance that some organisations could not conduct during the numerous lockdowns.

Industrial Heritage at Risk

16. We recommend the at-risk register focuses on sites where reuse is feasible, paragraph 195 of the NPPF should be borne in mind; there may be sites where accepting loss is inevitable where a new sustainable use cannot be found and it is not feasible as a heritage attraction site. Sector discussion around future management of such sites, sometimes also called 'curated decay' will be important into the future.

Knowledge and Skills

17. The knowledge and skills of maintenance and promotion of Industrial Heritage often remains with the groups and specialists looking after these sites. A resourced network for sharing and exchanging information would be an effective way to address this problem.
18. We welcome the proposal of a training offer for technical skills in the maintenance, repair and operation of machinery; however, we would also suggest an inclusion of Industrial Heritage skills in mainstream education courses to expand the reach and impact, and attract appreciation for these skills from a wider base. Modules on skills that are at risk of being lost could be factored into broader education programmes.

Research

19. We welcome the vision and actions in this area and recommend that HE should engage with societies and the research they conduct to help share the knowledge coming out of research, as well as identifying gaps in the knowledge.

Engagement, Participation and Promotion.

20. The vision and actions are admirable. Industrial Heritage sites can at times not be seen as aesthetically pleasing and some carry local memories of being dirty and unsafe places to work where the workforce was exploited. The Industrial Revolution is also now regarded as causing the present Climate Emergency. As a member response notes: "Industrial heritage offers an opportunity to disentangle relationships between impacts on our climate and environment that are surely regrettable, and the communities whose livelihoods, histories, identities and sense of place still ought to be acknowledged and celebrated...Placing Industrial Heritage at the heart of these difficult discussions will ensure its relevance, especially to younger generations less inclined to accept nostalgia without responsibility."

21. The Strategy should address the place of England's Industrial Heritage in the wider world, directly and sensitively, this will make its continuing relevance to society more apparent: fully explaining what we choose to retain is the most engaging and sustainable approach and the strategy should recognise and promote this.
22. In relation to both 'Industrial Sites preserved as Heritage Attractions' and 'Knowledge and skills', strategic planning of Engagement and Participation activities and partnerships with local education establishments and apprenticeship providers would give the opportunity for the practical application of classroom learning in engineering, surveying, construction, design technology and science.
23. Attention also needs to be drawn to the significance of Industrial Heritage that is no longer readily visible, but which shaped places and their communities. As acknowledged in the draft Strategy, HAZ's and similar initiatives – including their cultural programmes – can have important roles to play in this. Digital methods, trails, events, creative arts and so on all present engaging ways of recalling Industrial Heritage that is still significant though seemingly erased.

Themes:

Extractive Industries

24. We support the vision and areas for action. It is important to recognise that these industries left earthworks, holes in the ground, shafts and tunnels as well as spoil heaps, which can sometimes not be recorded or protected and which will be lost during remediation works.

Processing and Manufacture

25. We support the vision and areas for action. It is important to be able to understand what the most significant sites for every type of process or manufacture are so that they can be adequately protected.

Public Utilities and Telecommunications

26. It needs to be accepted that some sites cannot be kept (e.g. some Power Stations), but that others, though redundant (telephone kiosks), have become part of the national identity.

Transport

27. We welcome the inclusion of transport as a theme and support the vision and areas for action. We would like to emphasise that mobile heritage is as vitally important as built structures and it is important that the strategy reflects this.
28. Explicit reference ought to be made to products of industry that are themselves heritage assets, especially where the industry itself is not well represented by built heritage. In particular, the wrecks of ships and of aircraft should be regarded as Industrial Heritage in addition to their maritime or military characteristics and alongside the products of civil

shipbuilding. We have a fantastic resource of Industrial Heritage surviving as shipwrecks – though this too is still overlooked. Equally, aircraft wrecks – especially of types that have not survived in preservation – represent the Industrial Heritage of aircraft manufacturing that is not well represented by designated heritage assets.

Suggestions on any significant gaps or omissions in coverage

Funding

29. It is positive that the strategy brings focus to Industrial Heritage, but some of the actions are limited to 'review' or 'consider', and there is also limited reference to funding. If robust actions are not included with resources to ensure their delivery, the impact of the strategy will be limited. We would welcome further information in relation to the financial resources needed to achieve the expected outcomes, even if only an approximate figure over an estimated timeframe. This, linked to an action plan and programme of work which includes clear prioritisation and timescales for implementation, would make for a more effective Strategy document.
30. Historic England is a significant funder of many heritage organisations, and given the recent changes at HE and its move towards being a funder of last resort, further clarification is needed on the parameters of 'last resort'. Furthermore, the requirements related to funding have recently required more stringent elements that some organisations do not have the resources for.

Working heritage

31. In order for Industrial Heritage to be effectively protected and maintain its full value, more emphasis needs to be placed on maintaining operational heritage buildings and structures. If the buildings and structures upon which heritage depends are lost, then there is a far higher likelihood the heritage will in turn also be lost.
32. As public funding becomes more stretched, there will be increasing dependence on the ability to generate income through some form of heritage operation. The principle of heritage earning its keep is well recognised by the Strategy through building reuse for homes and businesses but this is too narrow for industrial and transport heritage. In the ports and harbour sector, there needs to be explicit recognition and support for safeguarding of operational heritage related assets such as historic quaysides, repair and support infrastructure used by historic ships and boats, and to display associated maritime heritage. For example, one way to ensure the heritage features of a small historic port are kept is to make sure that it is still working, accessible and can be used. If a developer makes changes such as filling in the creek, making it impossible for people to use the wharfage, the working interest is lost. This makes it more likely that the original setting will be lost along with the quality of the buildings as they would be converted to less desirable buildings. Continued

heritage related operational use can support building preservation and is often the best way to achieve educational and wider social and economic benefits from these heritage assets.

Airfields and Curtilage

33. While the aviation heritage sector has been highly successful in preserving historic artefacts either as static exhibits or as flying aircraft, the airfields from which aircraft take off and land has been overlooked. The categorisation of airfields as brownfield sites has led to the loss of airfields to housing development and continuing uncertainty over their planning status has deterred long term investment, greatly reducing sympathetic development and renovation as sustainable commercial operations.
34. While airfield buildings are important, the curtilage of the whole site requires more recognition in the strategy. Although economic benefits can flow from developments at airfield sites, such as becoming a vehicle test track, this causes harm to the overall significance of the site. Related to points 29 and 30, if less funding is available, sites may have prioritised income generation over the conservation of heritage assets. The impact that the loss of context has on a building is evidenced by Croydon Airport and the Beehive on Gatwick Airport.
35. Aerodromes need to be active for continued operation of historic aviation. Reductions in the landing ground areas can and do restrict operations. In a similar manner, the approaches and departures areas need to be protected where necessary using the Safeguarding process to prevent potentially dangerous high structures or agricultural processes (such as high vineyard rods) being approved that would endanger flying operations.
36. When considering ongoing active operation of heritage aviation, the interests of other heritage sites and assets in the area surrounding an airfield need to be considered, and Historic England should therefore take a holistic view.
37. At Stow Maries Great War Aerodrome, there is ongoing work with Natural England and Essex Wildlife Trust to safeguard the curtilage as well as ongoing work with neighbours, effectively meeting more than one Heritage agenda. The strategy should reflect that there is an overspill that needs to be taken into account when dealing with property/boundary issues.

Railways

38. Historic England should engage with independent railways as well as Network Rail as independent railways look after many heritage buildings. A key concern facing the independent railways sector is around the continued need to use coal to run trains. It would be welcome if Historic England recognised that this activity (with its relatively minor environmental impact in comparison to other forms of transport) is helping to preserve many heritage buildings.

39. The Heritage Railways Association would welcome Historic England's engagement on this topic, particularly as the sector's need to burn coal is limited compared to the rest of the transportation sector and efforts are being made to move towards more environmentally friendly alternatives in the longer term.

Other Omissions

40. In addition to knowledge and skills, oral history, written word, culture and the arts should also be included so the definition of heritage is not limited to built heritage - i.e. it should also incorporate our cultural heritage, food heritage etc.
41. Recognition of networks (such as the waterway network), canals, rivers, roads and railways as well as Industrial Heritage landscapes and townscapes should be recognised in the document.
42. The complexity and scale of Industrial Heritage must be taken into account in the actions of the strategy. As described under 'working heritage', once one element of heritage at a site is lost, it can in turn have an adverse effect on other heritage assets. For example, when the Balmoral ship in Bristol had its licence revoked and some dry docks were lost, there was no longer a place for the maintenance of the ship to be carried out.
43. The document should be reviewed to ensure that it is seamless with respect to maritime Industrial Heritage, to include ensuring that expertise in industrial maritime heritage is fully included within the scope of Historic England's advice and partnerships.

Local Plans

44. Some counties have Local Plans related to transport and connectivity, informed by central government policy and focussed on walking, cycling and using public transport. Some of these plans have been identified as omitting any reference to the vintage and historic aspects of an area. For example, in Oxfordshire, the local airport is not included, nor are the canals and river transport.
45. Promoting the adoption of local Plan Policies which could be tailored to suit the Industrial Heritage resources in individual local authority boundaries, may be beneficial in this area. In addition to championing expert advice, as mentioned in the Strategy, further protection might be given to assets through the inclusion of 'Industrial Heritage' policies in local plans, so guidance on how such policies could be formulated and worded would be useful as the wording needs to be specific to a particular locality.

Skills and knowledge

46. The CARE accreditation for engineers should be more widely promoted and included in the Strategy, as it would aid the efforts towards achieving the right balance between ensuring repairs are safe but are not more interventionist than necessary.
47. The sector is complex, with much private ownership and there is a heavy reliance on loosely grouped community organisations, the demographic of which may pose a threat to the long term sustainability of this model. We would welcome this complexity noted in the Strategy and actions added to address the challenges it poses.

For those responding on behalf of external bodies or organisations to suggest how they might be able to work with us in its delivery.

48. The Heritage Alliance would welcome the opportunity to work with Historic England to inspire future work through promoting and raising the profile of the excellent work of our members as showcased in [our reports](#). Examples used in this response have been taken from our [Heritage, Health and Wellbeing Report](#) and our [Inspiring Creativity Report](#).
49. We would also welcome continued Historic England support in advocating for fiscal incentives that promote reuse and changes to the planning system that limit permitted development and protect heritage.

For further information, please contact The Heritage Alliance.

Dr Hannah Shimko, Head of Policy and Communications

Telephone: 020 7233 0700

Email: policy@theheritagealliance.org.uk