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The Heritage Alliance

Heritage Alliance briefing paper on the English Devolution White Paper

The Heritage Alliance is the national umbrella body for heritage, a charity bringing together over 200 organisations to support and champion our sector. The Heritage Alliance sits on the Government's Heritage Council, and on the heritage sector's Historic Environment Forum. The vast majority of England's historic environment is owned, managed and cared for by Heritage Alliance members, including the National Trust, Historic Houses, Country Land and Business Association, English Heritage, the Canal and River Trust and the National Landscapes Association. We also represent professional bodies such as the Association of Local Government Archaeological Officers, the Institute of Historic Building Conservation and the Chartered Institute for Archaeologists. Our membership further includes the members of the Joint Committee of National Amenities Societies, many of whom are statutory consultees in the planning process. A specialist group of Heritage Alliance members has contributed to this briefing.

Overview

The Heritage Alliance welcomes the proposals in the White Paper. If designed and implemented well, they will increase the power of heritage to drive growth, regenerate towns and countryside and to strengthen communities.

There are many models for delivering heritage services through local government, and any can be made to work well given sufficient resources, expertise and influence. But realising the full regenerative potential of heritage has been hampered by lack of clarity about the respective roles of central government and complex tiers of local government, the withdrawal of resources, and the loss of expertise, influence and confidence. The radical proposals in the White Paper create an opportunity to maximise the power of heritage to help government deliver its growth and housing policies. The Heritage Alliance is optimistic that we could have a future where:

- heritage is recognised as an enabler, not a blocker, of growth
- central, strategic and local governments' perception of the value of heritage extends beyond tourism and the DCMS portfolio (a limitation of the White Paper's ambition) into housing and Spatial Development Strategies, economic development and regeneration, environment and climate change and community health and wellbeing
- accurate, up-to-date and timely data allow heritage to start adding value to growth and development at the design stage, and to reduce the risks of poor information or insufficient research causing unexpected but foreseeable heritage issues to delay social and economic benefit
- a community's future is enriched by its past, fostering shared identities and values

- an improved and increasing housing stock works with the grain of the landscape, reflects local traditions and provides homes that are valued by local communities because they are distinctive and have local character, rather than being imposed, off-the-shelf *anywhere towns* and *everywhere homes*
- older properties are made more carbon efficient through sympathetic change, avoiding inappropriate retrofit that saves little carbon and shortens the life of a home
- social and human capital is grown, by securing social value programmes during design, build and occupation
- skills, resources, strategies and policies mean that decision making is timely, confident and in most cases driven by **'yes, if...'**, not **'no, because'**

Against that optimistic background, the Heritage Alliance has identified some potential hazards if reforms were to be poorly thought through or badly implemented. The scenario to avoid is a disruptive change programme that leaves local authority services in a different pattern, but

- as under-resourced as now (or worse)
- with insufficient expertise, staff and influence to play their part in delivering the growth agenda
- acting as a drag on housebuilding
- unable to prevent the loss of heritage that is valued by individuals and local communities and which could have been put to productive use

How we can help

The Heritage Alliance and its members are keen to work with government to ensure that good outcomes are achieved, and to advise on how to avoid potential problems. We would like to discuss with and support government with the following goals.

1. Establishing a sounder understanding of what heritage is and what it can do to deliver government's agenda at national, strategic and local tiers
 - a. getting beyond its valued contribution to tourism
 - b. showing how heritage teams in ALBs, strategic and local authorities can support housing and Spatial Development Strategies, economic development and regeneration, environment and climate change and community health and wellbeing
 - c. increasing the reach of government by incentivising heritage owners and developers to provide desirable development: with the right signals, incentives can do most of the heavy lifting; with the wrong signals, markets will do little or nothing
2. Ensuring sufficient numbers and expertise of heritage staff at central government, strategic and local levels, with good working relationships between the three, so that strategy and delivery are informed and aligned
 - a. while recognising the huge demands on acute services, protecting the heritage resources for local authorities
 - b. achieving 'efficiency savings' by genuinely increasing efficiency (eg process efficiency in planning system, IT and redesign), not by cutting posts without a plan
 - c. maintaining or improving services through benchmarking capacity and performance
 - d. so that heritage is a planned lever for growth and not just a development constraint

3. Ensuring clarity about where responsibilities lie
 - a. balancing the drive for subsidiarity with strategic coherence (we interpret that development management will generally rest with local authorities, though the management of infrastructure development will need careful thought)
 - b. building on the strength and success of Historic England in providing strategic advice to the current architecture of local authorities, and maintaining this resource for future strategic and local tiers
 - c. building on successful co-operations such as the Black Country Core Strategy
 - d. establishing where the statutory duty lies for maintaining Historic Environment Records (HERs), placed on 'responsible' local authorities by the Levelling Up and Regeneration Act (LURA) but left unimplemented and with ambiguities: we believe they should be at strategic level
 - e. HERs are essential public records on which informed strategic and local planning is based, for development management, and therefore for sustainable growth: Greater London and West Yorkshire show the potential for HERs to be the starting point for Mayors, combined authorities and others for identifying the location of new development (though further impact assessment will normally be needed)
 - f. taking a broader definition of heritage services than the HER provision of LURA, to ensure that the information they contain is used and supplemented by local study for both Spatial Development Strategies and development management to realise good masterplanning and design that meets government and local ambitions

4. Gaining access to the support, encouragement and resources referred to in the White Paper (eg Local Skills Improvement Plans): such resources are required:
 - a. where heritage teams are currently small or dispersed, to combine them into fewer, larger entities with consequent improved efficiency, a greater range and depth of skills, better peer support and succession planning, and more confidence and influence
 - b. to handle the disruption to service delivery and the loss of skilled staff that structural reorganisation brings, to prevent either drags on growth or the unintended loss of heritage assets
 - c. to deal with existing skills deficits in heritage and construction, including retrofit

5. Building on the demonstrated success of Historic England and local government in using heritage as a catalyst for growth
 - a. the Heritage Alliance welcomes the recognition of the 'vital anchors' of culture heritage and sport in regional economies and that they are 'among the fastest growing industries with huge potential to drive local economic growth and create opportunities'
 - b. heritage charities, CICs and not-for-profits are often well placed to advise Mayors, LAs, owners and developers to help unlock the full potential of communities, eg through social value initiatives, the use of the skills and insights of local craftspeople
 - c. Heritage Alliance members are keen to continue to work alongside communities (particularly deprived ones) and authorities to get the best outcomes, by advising, enthusing and getting involved in practical projects
 - d. ensuring heritage teams work closely, or are integrated with, urban design teams – government does not want to see a repeat of the disastrous failures of the 1970s and later, when 'wholesale redevelopment' frequently dispersed the local (often working-class) communities, replacing viable and cherished historic cores with often poorly designed, isolating, cold and damp structures that continue to blight residents' lives and neighbourhoods

- e. there are opportunities to build on High Street initiatives that support town and city centres and the SMEs that are their lifeblood
 - f. the Heritage Alliance welcomes the proposal to empower communities to take on community assets, and sees an important role for heritage organisations in helping communities recognise the extent of their responsibilities and plan accordingly (there have been great successes and tragic over-reaches)
6. Addressing some policy and guidance mismatches to ensure effective delivery of Funding for Warm Homes, Public Sector Decarbonisation, Heritage Action Zones, Local Nature Recovery Strategies and other natural environment initiatives, etc
 - a. building on advice from heritage bodies, notably Historic England, to train decision makers and craftspeople how to decarbonise traditional buildings, and so lower the carbon footprint of existing stock, avoiding carbon hungry demolition/newbuild and damaging 'template' retrofit decisions
 7. Ensuring the necessary and overdue legislative and policy amendments the heritage sector needs to deliver government's vision effectively – where they fit into the reform programme for and architecture of the National Planning Policy Framework, National Development Management Plans, National Strategic Infrastructure Plans etc

Conclusion

The White Paper proposes a far-reaching reorganisation and empowerment of local government. The new architecture and powers will drive growth, housing and spatial development strategies. The changes provide huge opportunities to put heritage to work in support of these agenda, but for the heritage sector to realise its full potential:

- government needs a broader understanding of what heritage does, and more ambitious and demanding expectations of what we will do
- national and local government, especially given the limited availability of public funding, need a greater understanding of how markets and the owners of heritage assets can be helped and incentivised to provide desirable development
- there must be a clearly defined partnership of heritage services in national, strategic and local authorities, as such collaboration is central to the management of change and the delivery of growth plans and spatial strategies
- government must address the under-resourcing, skills challenges and vulnerability of local heritage services, if those services are to play their full part in the stronger, empowered, responsive and sustainable local government the White Paper heralds
- the radical nature of this and other planning-related government initiatives provides an opportunity to streamline policy and process by introducing some minor but critical changes to wording (but not intent) in law and policy, which would again help heritage deliver

The Heritage Alliance wishes to discuss with government how the sector can contribute to successful delivery of the White Paper. Our contribution would be far more useful and effective if those discussions take place now, rather than being delayed until publication of a draft Bill.