

Industrial Strategy Consultation Response

This is a joint Consultation response on behalf of The Council for British Archaeology (CBA) and The Chartered Institute for Archaeologists (CIfA)

About our Organisations

The Council for British Archaeology (CBA)

The Council for British Archaeology (CBA) is a charity committed to making archaeology accessible to anyone interested in exploring the stories of people and place. As the voice of archaeology in the UK we bring together community groups, commercial units, academics and heritage organisations to create and share opportunities to participate, discover and be inspired by archaeology.

Through our Listed Buildings Casework team and advocacy work we speak up for the historic environment. Our primary focus is around the archaeological and historic interest in the built environment, its appropriate conservation and changes within the historic environment being informed by an understanding of where significance lies in evidencing how places have evolved in relation to past people. We champion the important contribution that the historic environment makes to the place based identity and well being of current and future generations.

The CBA provides opportunities for people to participate in archaeology through the annual Festival of Archaeology and Young Archaeologists' Clubs, delivers the Archaeological Achievement Awards and a range of other events and activities throughout the year. Our youth engagement team ensure 16-25 year olds have opportunities to develop skills and leadership tools. By supporting our affiliate members and CBA groups with guidance, networking, promotion and training opportunities we help ensure that anyone can access the archaeology in their local area.

The Chartered Institute for Archaeologists (CIfA)

The Chartered Institute for Archaeologists (CIfA) is the leading professional body representing archaeologists working in the UK and overseas. CIfA promotes high professional standards and strong ethics in archaeological practice, to maximise the benefits that archaeologists bring to society, and provides a self-regulatory quality assurance framework for the sector and those it serves.

CIfA has over 3,800 members and more than 80 registered practices across the United Kingdom. Its members work in all branches of the discipline: heritage management, planning advice, excavation, finds and environmental study, buildings recording, underwater and aerial archaeology, museums, conservation, survey, research and development, teaching and liaison with the community, industry and the commercial and financial sectors. We welcome the opportunity to comment on this draft Industrial Strategy. We are really pleased to see the inclusion of partnership working and the establishing of regional 'self-help' Industrial Heritage Networks to share knowledge and work collaboratively. We fully support the proposed enhanced skills training offer, supported by a NLHF grant scheme.

Broad observations

- Who is this document aimed at? It reads like it is intended for a heritage specialist audience. This may limit its traction with wider audiences, who would make excellent partners in achieving the strategy's aims.
- The 1st 4 bullet points under 'Vision' are very specific and internally relevant to Historic England, rather than communicating a broad vision to partners. This information is captured elsewhere & perhaps doesn't need to be up front in the document. The final paragraph "Decision-makers, politicians and Government world's first industrial nation" should introduce the 'Vision' section.
- The 'Overview' could be more concise in defining the issue, scope and ambition of the document. Reference to the 2011 Industrial Heritage at Risk project could be captured in a footnote, as it refers to a 10 year old document.
- Local partners from outside the heritage sector, for example in higher education and local business, could bring diverse audiences to whom a local industrial past is incidental to personal priorities. However, engagement with local industrial heritage could support the development of employable skills and experience whilst enhancing a positive sense of place-based identity for contemporary generations.

Gaps and Omissions

We have identified a range of gap and omissions that would greater depth and relevance to the strategy and place it firmly within the context of heritage management today:

- Contemporary heritage concerns and social issues, which are currently not included, could be successfully integrated into this strategy.
- The initial statement limits the international importance of Britain's industrial heritage to the 'physical legacy of technical and scientific innovation'. This overlooks what the histories of industrial places evidence about the lives of working people, and global issues like colonisation, slavery, environmental exploitation, mass carbon emissions etc.
- Engagement with industrial heritage also holds forward-looking relevance around sustainability, retrofitting, technology transfer and co-production. For example, the re-use of built heritage for ecological reasons (embodied energy) is important to highlight. Sustainability targets to reach zero carbon emissions by 2050 (2030 in some local authorities) means 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.
- There are important, sometimes hard, stories to tell which feed into the narratives of our time (BLM, decolonisation, sustainability, social equity, alternative technologies etc). The strategy recognises the major social value of industrial heritage but it is largely silent on these important dimensions and the role industrial heritage plays in illuminating and reflecting on the realities that made England a global industrial and economic power.
- Can this be woven into the strategy perhaps in relation to its goals for section 9. and particularly in its collaborative partnerships with the volunteer communities that manage industrial heritage, and charitable trusts /social enterprises?
- It is great to see that the overall vision includes a commitment to the role of the Industrial Heritage Support Officer which is key to facilitating the massive voluntary sector resource that works with industrial heritage. The future of this role is uncertain (5.4) so good to see that securing its legacy is there as an action. But, beyond that, framing the role narrowly in

relationship to industrial heritage sites as visitor attractions, it misses the excellent point it could make about the major social value these site-based projects could potentially contribute to enabling community action and co-ownership, and for exploring the stories of working people's lives, both the 'difficult' histories (colonisation, slavery, pollution, industrial disease) and narratives of resilience, creativity and co-operation.

- Points at which the industrial heritage strategy links to other Historic England strategies and initiatives, as well as broader national agendas around sustainability, inclusion, diversity and equality and place shaping could be made more explicit and visually highlighted through colour coding or a key. This would increase the usability of the document.
- The ambition to work in partnership with other bodies at a local and national scale is fully supported. Opportunities for partnership working beyond the heritage sector could be massively advantageous, especially in articulating the relevance of past industry to place identity and reaching broader audiences, who are not directly attracted to 'heritage'. Partnership working beyond the heritage sector presents many possibilities to re-embed a site as directly relevant to the life blood of a community by focusing on supporting non heritage specific agendas.

Smaller details

- There are a few places where the word 'archaeology' is used as shorthand for 'below ground archaeological remains' (page 1, 4, and 14 twice). This is unhelpful – industrial sites are stacked full of evidential value/archaeological interest. A considerable degree being above ground in the very fabric, layout, machinery and surviving structures. Please can we see 'archaeology' as the process that unlocks this value and interest and not just the stuff!
- On p.11 reference is made to the Joint Committee of **Statutory** Amenity Societies, which should be the Joint Committee of **National** Amenity Societies.

Comments on the identified priorities

Protection, Planning and Conservation

- Does inclusion in conservation areas and local lists provide adequate protection within the planning system? When considered in a planning balance these protections often carry little weight, which would still make sites vulnerable to unsympathetic and over intensive schemes. Protection via conservation area status often focuses on facades and fails to conserve the evidential value of internal fabric and plan form.
- Industrial buildings often have high evidential value / archaeological interest which should be understood and used to inform appropriate change.
- An alternative, or accompaniment to local listing and conservation areas, would be a pre-emptive assessment of significance for a site. Having a significance assessment in place would support the reuse of a site in a way that is informed by an understanding of its significance.
- Designation can be off putting for developers who anticipate being overly restricted in designing a reuse scheme. However, a strategy for assessing significance, including evidential and communal values, in advance of any planning applications, would articulate

the constraints and opportunities of a site up front. This clarity would save time and money for potential developers.

- There is potential for facilitated community involvement in assessing and understanding what the built fabric, layout, social history and historical contribution of industrial structures reveals about the processes, people and technology that were there. Exploring this also helps to articulate industrial sites' communal value to the towns and places that often exist / grew as a result of these industrial sites.
- Engaging with the historical importance of a place can support a real sense of resilience around place-based identity as part of regeneration strategies. Industrial buildings often have high evidential value / archaeological interest which should be understood and used to inform appropriate change.
- This can be especially beneficial when a place has been affected by a loss of industry.
- Under point 2. We believe that "changes to the planning system itself may create additional challenges" understates 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 brown field sites. We recommend that the threat to redundant industrial sites would be high under these proposed, and to some extent inevitable, changes to the planning system. It seems likely that a front loaded evidence base will inform planning decisions in future. A proactive strategy to articulate significance, as well as the sustainability of reusing and retrofitting standing buildings to minimise carbon emissions and aid 2050 carbon neutrality targets is crucial.

Heritage attractions, skills development, engagement and participation

- The need to stimulate interest amongst younger generations and encourage greater inclusivity with England's industrial heritage is noted and we support this
- England's industrial heritage reflects the history and lives of working people. Industrial structures and machinery are products of engineering and technological discoveries. There is a close relationship to multiple contemporary practical, hands on skill sets around many STEM subjects. Industrial heritage presents the opportunity for the practical application of classroom learning in engineering, surveying, construction, design technology, science and innovation, including retrofitting for energy efficiency, and more. Re-establishing the relevance of industrial sites in the practical application of STEM related subjects at T levels (as well as earlier Key Stages) would engage local young people in developing employable skills whilst also establishing resilience around place-based identity, without that being an explicitly stated primary goal. Investment in T Level providers in the north of England is part of the Northern Powerhouse vision. Key strategic partners would be in local education establishments and apprenticeship providers.
- We very much welcome the proposed training offer for technical skills in the maintenance, repair and operation of machinery. We recommend that in order to engage a broader audience a training strategy should include strands in mainstream education courses, especially in colleges that teach practical skills. Modules on historical skills, that are under threat from being lost, could be factored into broader education programmes, perhaps as an introduction to larger courses. This introduction could develop appreciation and interest in them within the context of a skills-based course that is more easily perceived as improving employability rather than historical or niche. As such a larger audience would be reached.

- The social and economic circumstances of many ex-industrial areas in the north of England means that to attract new and younger audiences it is crucial that industrial sites feel relevant to participants and they feel their interaction is beneficial to them. For young people this can be around developing skills and enhancing their employability. Could voluntary programmes that offer experience of applying collage learnt skills support the surveying, maintenance and repair of local industrial sites. This could be through a collage or apprenticeship programme, where participation counts towards broader assessments.
- There are also opportunities for heritage sites that operate as tourist attractions to offer apprenticeships for softer skills around marketing, hospitality [&others] in order to engage with a broader younger audience and re-establish the relevance of industrial sites and resilience of local communities.
- We recommend that a continuation of the facilitating role, currently provided by the Industrial Heritage Support Officer will be crucial to successful implementation of this strategy.

Research

- The need for ongoing investment in research on industrial heritage demonstrates the economic and practical need for archaeology and heritage courses at universities. UAUK would be a key partner in identifying research gaps and strengths (8.4)

How we could work with Historic England in delivering this strategy

The CBA are happy to offer our support in a number of areas of this strategy:

- We will join Historic England in championing the sustainable and sympathetic reuse of industrial heritage sites through our statutory casework, as set out in 2.1, 2.3, 2.4 and 3.1.
- We will promote and champion industrial heritage in all aspects of our work.
- We will use the CBA Festival of Archaeology to promote Industrial Heritage where possible.
- We would like to establish a collaborative partnership with the Industrial Heritage Support Officer to explore wider collaboration.
- We would like to explore opportunities for our Youth Engagement programme and Young Archaeologist's Clubs to become more active in industrial heritage.