



IRMP Steering Group Integrated Risk Management Planning: Policy Guidance

Protection of Heritage Buildings and Structures



IRMP Steering Group Integrated Risk Management
Planning: Policy Guidance

Protection of Heritage Buildings and Structures

Communities and Local Government
Eland House
Bressenden Place
London
SW1E 5DU
Telephone: 020 7944 4400
Website: www.communities.gov.uk

© Crown Copyright, 2008

Copyright in the typographical arrangement rests with the Crown.

This publication, excluding logos, may be reproduced free of charge in any format or medium for research, private study or for internal circulation within an organisation. This is subject to it being reproduced accurately and not used in a misleading context. The material must be acknowledged as Crown copyright and the title of the publication specified.

Any other use of the contents of this publication would require a copyright licence. Please apply for a Click-Use Licence for core material at www.opsi.gov.uk/click-use/system/online/pLogin.asp, or by writing to the Office of Public Sector Information, Information Policy Team, Kew, Richmond, Surrey TW9 4DU

e-mail: licensing@opsi.gov.uk

If you require this publication in an alternative format please email alternativeformats@communities.gsi.gov.uk

Communities and Local Government Publications
PO Box 236
Wetherby
West Yorkshire
LS23 7NB
Tel: 08701 226 236
Fax: 08701 226 237
Textphone: 08701 207 405
Email: communities@capita.co.uk
Online via the Communities and Local Government website: www.communities.gov.uk

75% recycled

This is printed on
75% recycled paper

August 2008

Product Code: 08RSD05494/5

ISBN: 978-1-4098-0401-7

Contents

Section 1: Introduction	5
Section 2: Scope	7
Section 3: Risk Analysis	8
Section 4: Strategies	11
Section 5: Delivery Mechanisms	14
Section 6: Monitor and Review	15
Section 7: Devolved Administration	16
Annex A: Relevant legislation	17
Annex B: Corporate Social Responsibility	21
Annex C: National policy and other relevant IRMP guidance	22

Document Status

This guidance has been published by Communities and Local Government (CLG) on behalf of the IRMP Steering Group.

Representatives on the Steering Group include the Chairs of the Practitioners and Business and Community Safety Fora, Chief Fire Officers Association (CFOA), Confederation of British Industry, Health and Safety Executive, Local Government Association, Fire Protection Association, and the three main uniformed representative bodies as well as other key stakeholders from the “fire industry”.

CLG are of the view that an Integrated Risk Management Plan (IRMP) is best produced and implemented at a local level based upon local needs, but consider that these chapters of policy guidance will assist in ensuring a consistency in approach and quality in the way that IRMPs are produced. For the avoidance of doubt this guidance is not mandatory and has been made available for Fire and Rescue Authorities (FRAs) to use, should they wish to, in the development of themed areas of IRMP.

Section 1

Introduction

- 1.1 Fire and Rescue Authorities (FRAs) are required by the Fire and Rescue National Framework to produce a local IRMP that sets out the authority's strategy, in collaboration with other agencies, for reducing the commercial, economic and social impact of fires and other emergency incidents.
- 1.2 Paragraph 1.6 of the National Framework 2008-2011 requires each FRA to produce a publicly available IRMP covering at least a three-year time span which, amongst other things:
 - is regularly reviewed and revised and reflects up to date risk information and evaluation of service delivery outcomes
 - demonstrates how prevention, protection and response activities will be best used to mitigate the impact of risk on communities in a cost effective way
 - provides details of how FRAs deliver their objectives and meet the needs of communities through working with partners.

The National Framework for the Fire and Rescue Service (FRS) 2008-11 is available on the internet at:

www.communities.gov.uk/publications/fire/nationalframework200811

- 1.3 Safeguarding the heritage environment (both built and natural) is an essential component of the FRA's strategy.
- 1.4 This document is intended to guide FRAs in the preparation of an IRMP strategy for Heritage Protection. The purpose is to assist the FRS in understanding the scope of heritage considerations in the IRMP process to undertake risk analysis, develop response and prevention strategies, develop delivery mechanisms and to monitor, review and evaluate such activity.

- 1.5 The focus of the guidance is to identify, measure and mitigate the commercial, social and economic impact that fire and other emergencies can be expected to have on individuals, communities, commerce, industry, the environment and heritage. The IRMP needs to take account of this by setting out how the FRA will contribute towards the protection of our heritage and the contribution it makes to the economy and culture for local people and visitors to the UK.

“We cannot care for the historic environment or direct resources effectively, unless we understand what it is, its condition and how it is changing. We need continuous, thoughtful and well targeted research to enable us to identify significance and potential.”

Power of Place – English Heritage

- 1.6 The whole of our historic environment enriches our quality of life, and contributes to local character and a sense of place; and some historic buildings, monuments, landscapes and areas are of special importance nationally or even internationally. There is also a case to be made for its contribution to the local economy, as an employer, through associated business enterprise and through tourism. Whilst FRAs have a legal responsibility to ensure that effective arrangements are in place to deal with an incident that could adversely affect the rich heritage of our country through both planning and response, a moral responsibility also exists to ensure that the quality of life of the public is improved through the concept of sustainable development.
- 1.7 The protection of built and natural heritage is seen as a core function in an IRMP that is designed to improve the safety of the community.

Section 2

Scope

Legislation

2.1 The key legislation which FRAs will need to take account of in considering how to incorporate heritage matters in their IRMP strategy are:

1. The Fire and Rescue Services (FRS) Act 2004

2. Regulatory Reform (Fire Safety) Order 2005

3. The Civil Contingencies Act 2004

4. National Heritage Act (1983)

2.2 Further detail on the relevant aspects of the legislation cited is at Annex A.

2.3 In considering how to include heritage matters in the IRMP process FRAs will also need to take account of corporate social responsibility (see Annex B), national policy and other relevant IRMP guidance notes (Annex C).

Section 3

Risk Analysis

- 3.1 A key consideration in the analysis of risk will be whether buildings are listed.
- 3.2 The word 'listing' is a short-hand term used to describe one of a number of legal procedures which help English Heritage to protect the best of our architectural heritage. When buildings are listed they are placed on statutory lists of buildings of 'special architectural or historic interest' compiled by the Secretary of State for Culture, Media and Sport under the Planning (Listed Buildings and Conservation Areas) Act 1990, on advice from English Heritage.
- 3.3 The main criteria used in selecting buildings to be listed are:
- *architectural interest*: all buildings which are nationally important for the interest of their architectural design, decoration and craftsmanship; also important examples of particular building types and techniques, and significant plan forms
 - *historic interest*: this includes buildings which illustrate important aspects of the nation's social, economic, cultural or military history
 - *close historical association* with nationally important buildings or events
 - *group value*, especially where buildings comprise an important architectural or historic unity or are a fine example of planning (such as squares, terraces and model villages).
- 3.4 The older and rarer a building is, the more likely it is to be listed. All buildings built before 1700 which survive in anything like their original condition are listed, as are most built between 1700 and 1840. After that date, the criteria become tighter with time, because of the increased number of buildings erected and the much larger numbers which have survived, so that post-1945 buildings have to be exceptionally important to be listed. Buildings less than 30 years old are only rarely listed, if they are of outstanding quality and under threat.
- 3.5 Listed buildings are graded to show their relative importance:
- Grade I buildings are those of exceptional interest
 - Grade II* are particularly important buildings of more than special interest
 - Grade II are of special interest, warranting every effort to preserve them.

- 3.6 For IRMP purposes it is recommended that Grade I and Grade II* listed buildings are taken into account. FRAs should also be mindful of the need in the future to provide accurate data to the Regional Control Centres (RCC) on heritage risks within their areas to support operational response and subsequent incident reporting. In the meantime it would be prudent to liaise with the relevant FireControl project personnel to ensure that relevant heritage risk implications are incorporated into preparations for transition to the RCC.
- 3.7 In order to discharge its legal responsibilities and comply with the Fire and Rescue Service National Framework the FRA's IRMP should take into account the volume, nature and value of heritage buildings when planning emergency cover and preventative arrangements in terms of risk based inspection. In doing so it will be useful to establish and maintain communication and consultation arrangements with organisations and agencies that can assist in providing information on local heritage risks.

Sources of information on heritage risk

- 3.8 To assist FRSs in the assessment of heritage risks within their respective areas it is suggested that they should collate and assess information on:
- Details of the addresses and grade of heritage properties. This information has been provided to FRSs by English Heritage and the relevant body in the devolved administrations. In England this information can also be accessed at www.english-heritage.org.uk/server/show/nav.1379 (user name and passwords have been supplied to each FRS)
 - Identification and location of historic properties - Use of FSEC or other GIS/ Database to provide an overview of the heritage risk. This should include locations (not exhaustive or inclusive) such as World Heritage sites (whc.unesco.org/pg.cfm?cid=31), vulnerable city centres, moored vessels, locally important sites, thatched properties etc
 - Identification of Sites of Special Scientific Interest, mines or other natural or industrial legacy sites. For SSSI it is recommended that the FRS contacts the Natural England regional director (www.english-nature.org.uk/special/ssi/) to identify a local liaison officer. It is suggested that a useful starting point would be to agree communication and local procedures for Natural Nature Reserves which are directly managed by Natural England as these represent the most sensitive/ significant sites
 - The potential for other events to impact upon heritage properties or assets, such as flooding, wildfire areas, industrial risks, fire water run off from external sources etc

- Flood risk. A useful source of information on the threat of flooding to built heritage can be found at:
www.helm.org.uk/upload/pdf/Flooding_and_Historic_Buildings._Technical_Advice_Note_2004.pdf
- The historic importance of elements of buildings (or assets) and the significance of contents
- The use of buildings (or assets) and their utility to the wider community. This should also include consideration of temporary or transient risks, such as storage of heritage artefacts in temporary accommodation, visiting international exhibitions, rotation of museum stock etc
- The potential economic impact from loss of heritage sites upon the wider community
- The Historic Houses Association can provide useful information on those heritage properties owned/occupied privately. Further details can be found at their website www.hha.org.uk/
- Sharing assessment of risks across borders for the purposes of mutual aid (Section 13 and 16 of the FRS Act 2004 in England & Wales)
- FRAs should also be mindful that some heritage properties or assets may also be of such national significance that they may be subject to malicious actions which should be considered within the risk analysis. These properties or assets may therefore be included in the CCA Community Risk Register and internal risk registers as outlined earlier
- A web-based interactive map, which brings together geographic information on key environmental schemes and designations, is available at:
www.magic.gov.uk/

Section 4

Strategies

Overview

4.1 Strategies available to the FRA to reduce the likelihood and severity of incidents involving heritage risks are set out below under the general headings of Prevention, Protection and Operational Response. These areas also align in principle with the relevant areas of Civil Contingency Planning.

Prevention

4.2 Where applicable ensure that appropriate fire safety measures are being taken to satisfy the requirements of the Fire Safety Order and that these measures are reflected in emergency cover planning.

4.3 The FRA will also be able to complement safety arrangements under the Fire Safety Order by working with owners and responsible people, including Crime Prevention Officers and insurers, to minimise the likelihood and impact of fires and other emergencies. This may also include liaison with police architectural liaison officers, responsible persons and access to heritage specialists, including those dealing with restoration on strategies specific to the heritage or asset.

4.4 Where arson is considered to be a risk work with Crime and Disorder Reduction Partnerships to develop arson reduction strategies. In relation to 'natural' heritage, consider public education and arson reduction measures to reduce the likelihood and impact of deliberate fires.

4.5 Where applicable work within Local Strategic Partnerships to promote the significance of preventative measures to reduce the likelihood of emergencies occurring, especially where heritage is a significant part of the local economy.

Protection

4.6 Monitor the application of risk control measures in heritage sites or assets and their ability to minimise damage and risk to firefighters and other agencies involved.

- 4.7 Work with owners, responsible persons and other stakeholders such as English Heritage and insurers to minimise the severity of fires and other emergencies. This may include for example the use of:
- automatic fire detection
 - fire suppression systems
 - water leak detection systems
 - compartmentation
 - ventilation.
- 4.8 Influence the planning for fires and other emergencies to improve emergency response at the site, attendance of the FRS, business continuity for post incident recovery and information exchange.
- 4.9 Develop salvage arrangements for fires and other emergencies, including the availability and attendance of specialist teams and equipment.
- 4.10 Work with agencies and groups who would be involved in responding to an emergency to develop an appreciation of each other's needs during an incident and subsequent salvage operations. This may include matters such as command & control functions, cordons, access to buildings, likely firefighting and recovery strategies etc.

Operational response

- 4.11 Ensure that emergency response arrangements take into account the outcome of the risk analysis and strategies identified to meet the likelihood and consequences of emergencies. This may include the use of FSEC or other risk based GIS systems to consider, evaluate and determine risk based emergency cover arrangements specific to heritage risks. Also of relevance is information obtained to pre-plan for fires under 7(2)(d) of the Fire and Rescue Services Act 2004.
- 4.12 Issues to be considered are:
- Timely consultation between owners, regulators such as English Heritage (Historic Scotland, CADW and EHSNI) and the local FRSs in determining strategic emergency cover arrangements for heritage risks
 - Development of risk based policies and guidance specific to individual heritage risks

- Ensure that the planning scenario takes into account the potential requirement to mount simultaneous firefighting and salvage operations, possibly involving staff or occupiers
- Specify the response to emergencies in heritage risk which takes into account the special nature of the buildings, potential for rapid fire spread, inundation from flooding etc and the requirement for early salvage work and risk to firefighters. This may include the modification of pre-determined attendances to specific risks in light of local circumstances and the significance of the heritage risk under consideration
- Ensure that relevant FRS responders are provided with accurate, timely and relevant information, instruction, training and supervision appropriate to the nature and severity of the heritage risk. This should be based on the operational intelligence gathering required by Section 7(2)(d) arrangements of the Fire and Rescue Service Act. Relevant information should also be disseminated where appropriate to other emergency responders within the context of the Civil Contingencies Act
- Development of Standard Operational Practices and procedures with other responding FRSs under Section 13 and 16 arrangements
- Utilising Mobile Data Terminals and access to complex plans at site for first responders
- Access to water for firefighting especially in rural areas
- Traffic management in and around potentially congested sites or areas (such as sites where vehicle access may be remote from areas of the premises or historic town centres with restricted vehicular access).

Section 5

Delivery Mechanisms

5.1 It is suggested that the following steps on the part of the FRA will be useful in ensuring that the strategies are effectively delivered:

- Undertake a review of local working arrangements between the FRS, local owners/occupiers of heritage sites, English Heritage and other stakeholders (such as insurers) to ensure appropriate issues are discussed and included in emergency cover and response plans
- Consider a schedule of operational exercises that enables crews to gain generic skills associated with heritage risks that can be applied in a broad range of scenarios
- Establish planning arrangements for heritage incidents that include plans detailing the specific measures required for sites that constitute a significant risk to the environment in accordance with Sections 7(2)(d) and 9(3)(d) of Fire & Rescue Services Act 2004 and the Civil Contingencies Act 2004. See also the Chapter on Environmental Protection for further guidance
- Note that in order for FRS personnel to deal effectively with heritage incidents it is essential that they have access to appropriate information regarding heritage sites, damage limitation plans, access to specialist advice and resources.
- Note that learning and development strategies should include the competencies associated with delivering prevention, protection and response arrangements for heritage risks and assets. Strategies should also include accessing incident data drawn from all available sources to consider learning outcomes and their applicability to local circumstances eg Windsor Castle, Hampton Court Palace, Cutty Sark etc
- Develop plans which utilise assets provided for heritage protection and other purposes, for example the National Trust has some 17 X 3 tonne trailers, Mines Rescue has specialist teams and the use of New Dimension assets such as IRUs for salvage shelters
- Test arrangements and pre-planning assumptions on a regular basis.

Section 6

Monitoring and Review

- 6.1 Where monitoring and review processes relating to heritage risk reduction arrangements are not in place, these arrangements should be implemented to evaluate the efficacy of the heritage risk reduction strategy.
- 6.2 Partnership arrangements with English Heritage should include a formal debrief of appropriate heritage related incidents to ensure lessons are learned and good practice shared.
- 6.3 Results of operational debriefs from all heritage related incidents and exercises should be considered as part of the IRMP process of risk analysis.
- 6.4 Consideration should be given to the development of a performance management system pertinent to heritage risk reduction.
- 6.5 The Incident Reporting System will collate suitable and sufficient information to inform the ongoing development of IRMPs and the risk mapping process.

Section 7

Devolved Administrations

7.1 Whilst this guidance note covers England, the general principles are applicable in the devolved administrations. Further details of heritage protection arrangements in Scotland, Wales and Northern Ireland can be found at the following websites

Scotland www.historic-scotland.gov.uk

Wales www.cadw.wales.gov.uk

Northern Ireland www.ehsni.gov.uk

Annex A

Relevant legislation

FRS will need to be mindful of the following legislation in developing their IRMP with respect to Heritage as cited in the scope within Section 2 of this document. This annex also provides legislative context to the work of English Heritage and its roles and responsibilities.

1. The Fire and Rescue Services Act 2004

Sections 6 and 7 place the following duties on Fire and Rescue Authorities:

Section 6 Fire Safety

(1) A fire and rescue authority must make provision for the purpose of promoting fire safety in its area.

(2) In making provision under subsection (1) a fire and rescue authority must in particular, to the extent that it considers it reasonable to do so, make arrangements for –

- (a) the provision of information, publicity and encouragement in respect of the steps to be taken to prevent fires and death or injury by fire;
- (b) the giving of advice, on request, about –
 - (i) how to prevent fires and restrict their spread in buildings and other property;
 - (ii) the means of escape from buildings and other property in case of fire.

Section 7 Fire Fighting

(1) A fire and rescue authority must make provision for the purpose of –

- (a) extinguishing fires in its area, and
- (b) protecting life and property in the event of fires in its area.

(2) In making provision under subsection (1) a fire and rescue authority must in particular –

- (a) secure the provision of the personnel, services and equipment necessary efficiently to meet all normal requirements;
- (b) secure the provision of training for personnel;
- (c) make arrangements for dealing with calls for help and for summoning personnel;
- (d) make arrangements for obtaining information needed for the purpose mentioned in subsection (1);
- (e) make arrangements for ensuring that reasonable steps are taken to prevent or limit damage to property resulting from action taken for the purpose mentioned in subsection (1).

Section 9 gives the Secretary of State power to confer on a Fire and Rescue Authority functions relating to emergencies, other than fires and road traffic accidents.

Section 11 gives Fire and Rescue Authorities the power to respond to other eventualities. This includes an event or situation that causes or is likely to cause:

- One or more individuals to die, be injured or become ill
- Harm to the environment (including the life and health of plants and animals)

The Fire and Rescue Services Act 2004 is available on the Internet at:
www.opsi.gov.uk/acts/acts2004/20040021.htm

2. Regulatory Reform (Fire Safety) Order 2005

Extract from Article 26

(1) Every enforcing authority must enforce the provisions of this Order, and

(2) In performing the duty imposed by paragraph (1), the enforcing authority must have regard to such guidance as the Secretary of State may give it.

Extract from Article 27

(1) Subject to the provisions of this article, an inspector may do anything necessary for the purpose of carrying out this Order and ...shall have power to do at any reasonable time... to require the production of...any records (including plans) and to inspect and take copies of the records.

The Regulatory Reform (Fire Safety) Order 2005 is available on the Internet at:
www.opsi.gov.uk/si/si2005/20051541.htm#27

3. The Civil Contingencies Act 2004

One of the aims of the Civil Contingencies Act 2004 is to improve the UK's ability to deal with the consequences of major disruptive incidents by improving the planning process at a local level.

The definition of an emergency within the act includes "an event or situation which threatens serious damage to the environment". In the context of this guidance note environment is taken to include the heritage environment; a term used in the UK Resilience website and associated documentation.

The definition of an emergency is concerned with consequences rather than with cause or source.

The Civil Contingencies Secretariat issue Local Risk Assessment Guidance (LRAG) annually to support Category 1 responders in fulfilling their statutory duty under Section 2 of the Civil Contingencies Act. The classified LRAG provides generic national guidance on hazards occurring at a local level which Category 1 responders should consider when maintaining Community Risk Registers.

The guidance identifies the hazards that Local Resilience Forums (LRF) may wish to consider in developing their Community Risk Registers. Likelihoods, threats and vulnerabilities are assessed for a five year period so that the risk assessment will support strategic planning for the medium term.

Risks are categorised indicating the type of threat or hazard in question, FRSs should give consideration to the risks identified in their local Community Risk Registers when preparing an IRMP Heritage Protection Strategy.

The Civil Contingencies Act 2004 is available on the Internet at:
www.opsi.gov.uk/acts/acts2004/20040036.htm

4. Legislative context to the work of English Heritage and its roles and responsibilities.

The National Heritage Act 1983 sets out the powers and responsibilities of English Heritage, the Government's statutory adviser on the historic environment, which reports to Parliament through the Secretary of State for Culture, Media and Sport (DCMS).

English Heritage is an Executive Non-departmental Public Body officially known as the Historic Buildings and Monuments Commission for England, funded in part by the Government and in part from revenue earned from their historic properties and other services. Its functions are:

- acting as a national and international champion for the heritage
- giving grants for the conservation of historic buildings, monuments and landscapes
- maintaining registers of England's most significant historic buildings, monuments and landscapes
- advising on the preservation of the historic environment
- encouraging broader public involvement with the heritage
- promoting education and research
- caring for Stonehenge and over 400 other historic properties on behalf of the nation
- maintaining the National Monuments Record as the public archive of the heritage

- generating income for the benefit of the historic environment
- acting as statutory consultee for many planning permission, listed Building consent and scheduled monument consent applications affecting the historic built environment.

A Draft Heritage Protection Bill is planned to be introduced in 2009, for implementation in 2010. This will change the title of listed buildings to “Registered Heritage Assets” the gradings of buildings will remain the same, but will be known as G1, G2* and G2.

Details of the National Heritage Act as amended can be accessed from the UK statute database at: <http://www.statutelaw.gov.uk/Home.aspx>

Annex B

Corporate Social Responsibility

- 1 The Government sees CSR as the business contribution to their sustainable development goals. Essentially it is about how business takes account of its economic, social and environmental impacts in the way it operates – maximising the benefits and minimising the downsides. Specifically, Government see CSR as the voluntary actions that business can take, over and above compliance with minimum legal requirements, to address both its own competitive interests and the interests of wider society.
2. It is for the FRA to consider and determine the extent to which CSR applies to the service locally and the extent to which different aspects of service delivery, including those associated with the wider social agenda, discharge that responsibility.
- 3 Whilst there is a statutory duty for FRSs to respond to fires, the public may also expect that they will work with other agencies such as English Heritage, Natural England, the National Trust, CPRE, CADW, Historic Scotland or the Dept of Environment in Northern Ireland to prevent damage and deterioration to heritage buildings. This would include making arrangements for dealing with flooding, inclement weather and other incidents affecting heritage risk. There is also a statutory duty to prevent fires placed on the responsible person for a particular premises; and, as a potential place of work, there is also the requirement for the FRA to assess the adequacy of Fire Safety Risk Assessments through The Regulatory Reform (Fire Safety) Order 2005 (RRFSO).
- 4 Further information on CSR can be found at www.csr.gov.uk

Annex C

National policy and other relevant IRMP guidance

In addition to the National Framework, FRAs will wish to consider the following:

1. Relevant IRMP Guidance notes

Guidance Note 1

Paragraph 1.2 states that the Government thinks that a modern and effective fire and rescue service should serve all sections of our society fairly and equitably by ... safeguarding the environment and heritage (both built and natural).

Guidance Note 4 Fire Authority Integrated Risk Management Planning

Annex A Paragraph 2.2 states: It must be borne in mind that an assessment of the risk in a building, and its subsequent inclusion in a fire safety inspection programme, can be made for a number of reasons other than the legal responsibilities of the fire authority. These could include, at a national or local level:

- the strategic importance of a particular property or business,
- *the potential loss of heritage,*
- potential environmental damage, and
- the need to assess likely fire fighting operations.

IRMP policy guidance on Wildfire which will be of assistance when considering the impact of wildfire upon natural heritage.

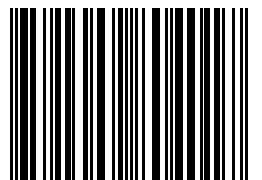
The IRMP Guidance Notes are available on the internet at:

www.communities.gov.uk/fire/developingfuture/integratedriskmanagement/

2. IRMP policy guidance chapter on Wildfire

ISBN: 978-1-4098-0401-7

ISBN 978-1409804017



9 781409 804017