



Heritage Lottery Fund Strategic Funding Framework Consultation

Response by National Parks England March 2018

Introduction

0.1 National Parks England (NPE) supports the policy-making process by co-ordinating the views of the nine English National Park Authorities (NPAs) and the Broads Authority. It is governed by the Chairs of the ten authorities. We welcome the opportunity to respond to this consultation. Our response represents the collective view of officers who are working within the policies established by the NPAs and Broads Authority and follows internal consultation amongst the officers. Our response follows the structure and headings provided in the consultation questionnaire.

0.2 NPE and the NPAs have developed a strong working relationship with HLF at both local and national levels and we hugely value the contribution this has made. The support of HLF has enabled transformative programmes to be achieved over the past 20 years in National Parks. We acknowledge, in particular, the funding that HLF has provided to programmes that simply would not be available from other funding sources.

PART 1: HLF's role now and in the future

1.1 HLF has established a positive role for itself in not only distributing funding, but also building partnerships and developing innovative and far-sighted programmes. NPE believes that HLF should build on its experience and the evaluations of its work that have been undertaken to continue in this vein. Its primary role in administering and distributing grants should continue to be central to HLF's focus, and this should be done in a way that evolves to address the current and future challenges facing natural and cultural heritage.

1.2 We would have concerns about HLF positioning itself as "leading" the heritage sector as this could impinge on the roles of other bodies, including statutory agencies (such as Historic England and Natural England) who can apply the necessary standards and rigour. It is important to avoid duplication of the roles of these bodies. It could also set up a conflict of interest if HLF is a "leading" organisation while also making grant funding decisions. This is not to suggest that HLF should not be at the forefront in recognising opportunities for innovative approaches, as was the case with the development of the Landscape Partnerships programme.

1.3 We see the primary role of HLF being to provide funding for heritage projects. HLF can play an enabling role for applicants and organisations in the heritage sector, by:

- advocating for the value of heritage;
- supporting organisations within and beyond the heritage world to come together;
- collaborating and networking;
- inspiring and promoting innovation; and
- helping people and communities to meet their aspirations.

PART 2: Strategic priorities for heritage and people and measuring our impact

2.1 We wish to see natural, built and cultural heritage put on an equal footing in the strategic priorities for HLF. The recently published 25 Year Environment Plan and the 2017 Heritage Statement provide an excellent starting point in determining strategic priorities for the coming years and should be a key reference point for this exercise.

2.2 Landscape should feature in the strategic priorities as it enables consideration of natural and cultural heritage to be brought together. Landscape Partnerships have proved effective and far-sighted in the way that they have made real connections between people and landscapes, and fostered people's understanding of and attachment to places where they live, work and visit. The scale of these partnerships has also been effective in building robust partnerships and achieving positive change over large areas of land. Landscape-based approaches are central to the delivery of National Park purposes and we wish to see HLF continue to support this delivery. This would also support the Government's intentions to support "more fundable projects in the Natural Heritage sector", as set out in the 8 Point Plan for England's National Parks.

2.3 With regard to addressing under-representation in HLF's funding and making heritage more inclusive we suggest that HLF should consider how to recognise a wider range of expressions of heritage, including intangible forms of heritage and those heritage assets which may not be listed, scheduled or designated but are demonstrably important to people. We feel that this would enable a better assessment of the importance of the heritage asset and therefore would enrich the variety of heritage assets that HLF currently support.

2.4 Additionally, HLF should recognise that while working in rural and sparsely-populated areas (such as National Parks) can be both more difficult and more expensive, it is also vitally important to conserve the particularly rich wildlife and culture of these areas. Consideration should be given to how isolated rural communities can be represented in HLF's efforts to make heritage inclusive.

2.5 In measuring its impact, HLF should consider a range of criteria that capture (where possible) the full range of benefits that may be provided. These include natural capital, health and well-being, and social benefits as well as improvements to the condition of heritage, skills, organisational resilience and economic benefits. Such impact measures can help demonstrate the many benefits of investing in heritage (in its broadest sense) and can help in assessing the added value that projects will provide; however heritage needs and impact should remain the primary considerations in awarding grants.

PART 3: Strategic interventions and partnerships

Place-making / Resilience and capacity building / Involving the public in our decision making

3.1 NPE welcomes the intention for HLF to put heritage at the heart of place-making to help communities – including those in deeply rural areas – to fulfil their aspirations for the future. This approach needs to reflect the full breadth of cultural and national heritage, and to recognise that different approaches will be needed in different settings.

3.2 We believe NPAs will be appropriate and natural partners for HLF to work with in National Parks. NPAs are well-established, trusted and effective delivery bodies with a strong track record of bringing partnerships together and integrating a wide range of priorities to achieve positive place-based outcomes. HLF and NPAs have common ground in acting as an 'honest broker' for partnerships across sectors, involving range of partners from statutory agencies to not-for-profit organisations and community groups. It makes sense to align our efforts and make use of existing arrangements and resources, such as National Park Management Plans (also called Partnership Plans) that are developed

and delivered through local consultation and partnership. Management Plans can help to define both areas of opportunity, and heritage at risk.

3.3 We would welcome further discussions with HLF about the role that NPAs might play in the future in terms of engaging with communities and landowners in National Parks and distribution of funding, to enable value-for-money projects to go ahead in these challenging to reach areas. NPAs have considerable skills, knowledge and expertise in developing and assessing heritage and environmental projects that could be of benefit to HLF; and we would welcome further exploration of the potential for local grant schemes in National Parks that would contribute to the delivery of HLF's strategic priorities and National Park purposes and Management Plans.

3.4 To improve resilience in the sector overall and across a range of organisations it will be important that HLF maintains the aspects that made Landscape Partnerships so successful, including recognition of the resource needed to properly support and facilitate genuine partnership working. The 'What has HLF done for nature?' report identified that HLF's role in enabling disparate organisations to develop consensus thinking and plan ahead together has been key to the large-scale successes achieved. HLF's acceptance of full cost recovery has helped in recent years, but for small organisations there is still a challenge in resourcing the preparation of ambitious and innovative bids. Providing funding that supports fundraising capacity and that enables testing of new ideas will also help to enhance resilience in the longer term.

Non-grant finance

3.5 HLF has helped many organisations to deliver projects that they would be unable to resource themselves, and this has achieved very positive impacts in National Parks. As recognised in the 'What had HLF done for nature?' report, National Park Authorities have very limited discretionary budgets which makes it difficult to deliver projects of the significant scale required in National Parks without accessing funding from HLF and other sources.

3.6 While there may be a role for HLF to provide different funding mechanisms such as loans, these will not always be appropriate. For example, a project focused on urban building reuse may provide a commercial opportunity that would facilitate payback of a loan; this would be much more challenging for a rural and nature-focused project. HLF should recognise different types of value that projects create (for example, natural capital benefits that flow to people), and that loans may be helpful for some purposes but grant funding will remain important for others. There are other options for loan funding already available if organisations do wish to use this type of finance; and local authority debt boundary limits may impact on the ability of National Park Authorities to benefit from such forms of non-grant finance.

3.7 There is at present increasing focus on innovative finance, and National Park Authorities are not alone in seeking to become less reliant on Government funding and to supplement grants with other sources of income. The continuing availability of grants, especially at a time when grant funding from European sources is likely to reduce significantly, remains a crucial element in the funding mix. With many organisations looking to innovative finance mechanisms and grants, HLF will need to be aware of the highly competitive environment in which it will be operating and should not add unnecessary extra competition.

PART 4: Our portfolio

4.1 We welcome the intention in the proposals for the open grant programme to increase flexibility and respond to emerging needs or opportunities, and we particularly welcome the proposal to increase the upper ceiling for single round applications from £100,000 to £250,000 so that a wider

range of projects will be able to benefit from quicker decisions and simpler processes. Regarding the balance of grant amounts, we believe equal weight should be given to smaller and larger grants.

4.2 We agree that tailored guidance and resources will be needed to assist applicants focusing on specific types of heritage and we are pleased to see that this will include the development of guidance and resources for landscape-focused projects. This will be crucial to build on the success that landscape partnerships have delivered to date.

4.3 We welcome the introduction of strategic campaigns and we suggest the following areas of potential focus for the initial years:

- Supporting the priorities set out in the 25 Year Environment Plan; and
- Supporting and recording intangible forms of heritage.

4.4 We agree with the proposal that environmental sustainability should be embedded by all projects and should form part of the standard criteria for assessing applications, rather than only being monitored as an outcome of projects.

PART 5: Improving the experience for customers

5.1 We consider that, to date, HLF has offered applicants good support during the development and application process. We wish to see HLF continue to strike a balance between bringing rigour and challenge to the process to set a 'gold standard' for quality projects, while also keeping processes proportionate and pragmatic for applicants.

5.2 Looking to the future and in view of the proposal for an open grant programme, we consider that effective communication will be of central importance so that it is clear to potential applicants what the current funding priorities are and what strategic campaigns are coming up. This pipeline approach will be necessary to enable groups and organisations to plan ahead in developing their funding bids.

5.3 We agree with the proposal to introduce an expression of interest screening stage for grants over £250,000. It is challenging for many potential bidding organisations (including NPAs) to find the capacity to resource the preparation of large bids, and the risk of investing significant time and effort in projects that do not stand a good chance of going forward is a deterrent to applicants. A screening stage that ensured more reasonable success rates for larger bids would therefore be a welcome development.

National Parks England
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