



Response to the English Heritage New Model Consultation – February 2014

National Parks England supports the policy-making process by co-ordinating the views of the ten English National Park Authorities. It is governed by the Chairs of the ten Authorities. Our response represents the collective view of officers who are working within the policies established by the National Park Authorities (NPAs) and follows internal consultation amongst Historic Environment officers. We are happy for our response to be made publicly available and would be happy to discuss any of the points we make further with officials if that would be helpful.

Chapter 3: The Charity

1. The consultation outlines the benefits of the new model for the National Heritage Collection. Do you:

Somewhat agree

2. If you either strongly or somewhat disagree with the proposed benefits why is this?

We are generally in agreement with the principles of the new model but do have some concerns about the assumptions regarding the income generating capability of the charity. We would welcome greater clarity on how these assumptions were arrived at and how the charity is to sustain itself in the long term. What will be the implications for the National Heritage Collection should the predicted income not be achieved?

Regarding the assumptions for increasing membership, we note the trend shown on Chart 1 appears to be flattening and question the basis of the predictions for the future which appear to be based on continued growth, which would seem optimistic in an increasingly crowded and competitive market.

We also have concerns around the reliance on receipts from legacies, as the statement that these “should increase due to the move to charitable status” is unsubstantiated. Whilst it is accepted that charitable status and a focus on building a legacies strategy will enhance funding from this source, it would be useful to see some benchmarking on how the predicted income is to be derived.

We would also welcome greater clarity as to how private sector sponsorship is to be sought and the financial benefits of this approach. We are concerned about the potential privatisation of heritage and the conflict with the statement in the introductory section regarding the difficulties of securing investment in properties with no obvious beneficial use or tangible financial benefit. This appears irreconcilable with the desire to secure private investment for such sites. We are also concerned about potential competition for resources with existing heritage bodies, including National Park Authorities (please see reference to the Joint Statement on the Historic Environment later in this response). It is noticeable that private sector sponsorship in the arts sector is heavily biased towards London. We would seek some assurances that the geographical distribution of resources will be distributed based on heritage need, and that heritage in rural areas will receive due consideration.

A result of the failure to realise income would be a need for additional grant to the charity beyond a flat settlement to 2018/19. A major omission from the consultation document as it stands is an explanation of the contingencies that would be in place to deal with this situation. We are concerned that the impacts on other parts of the heritage sector have not been fully taken into account, such as increased competition to a finite pool of volunteers, for legacies which might otherwise go to other Heritage Sector organisations and for grants from the Heritage Lottery Fund.

3. Are there any further benefits that could be delivered by this model?

None

4. Are there any other key opportunities for the charity to increase earned income in addition to those outlined in this consultation?

Yes

5. If yes what are they?

The opportunities for income generation outlined in the document are comprehensive, but we would like to see greater clarity on how these sources are to be more fully explored. We feel the main opportunities are linked to tourism as this has the greatest draw, but are cautious about the attraction of sponsorship and the perceived commodification of heritage at the same time. Any increased focus on the narrow cost effectiveness of individual heritage sites also impacts on other aspects of the tourism sector. For example, what has been the economic impact on businesses in the vicinity of those English Heritage sites which have recently had their winter opening hours reduced?

The wider economic value of heritage beyond the narrow site value needs to be recognised as do the wider social benefits of heritage.

The document is not clear on the evidence for consideration of alternative models, other than transferring profitable sites to third parties leaving those loss making free

sites in the ownership of the charity, which we agree is not a sustainable way forward. We would like to see consideration given to other models of income generation which might see rural development and enterprise uses for parts of the heritage collection. This could include rural business uses or small scale tourism developments. Clearly many sites will not be suitable for such uses but an audit of possible sites which may lend themselves to appropriate income generating uses through heritage led regeneration should be considered.

6. What aspects of the current service provided by English Heritage in relation to the National Heritage Collection is it important that the charity maintains?

We feel it is fundamental to retain the core principle that the National Heritage Collection belongs to all of us, regardless of position, income, status etc. It is the inheritance of a rich and diverse past and the charity must promote sustainable management, interpretation, presentation and affordable public access for public enjoyment, understanding and appreciation.

Access, real and virtual, educational, affordable and geographic is critical to retaining the common ownership of our heritage. We would not wish to see initiatives which unnecessarily restrict access in any way.

7. What are the opportunities to further enhance the services that will be offered by the charity?

We agree that by eliminating annuality the charity can be much more proactive and take a long term strategic view of the conservation and maintenance of the collection.

8. Do you agree that the suggested charitable objectives are broadly the right ones?

No.

9. If no, what changes to them do you think should be made?

We generally agree that the conservation of and the advancement of public awareness, knowledge, understanding, access to and appreciation lie at the heart of the charity's core objectives. We would suggest that bullet point two (of 3.19) should specifically include understanding and access. We do believe that the third bullet point is less of an objective than a means to achieve those objectives through providing educational facilities and services, instruction and information but welcome the commitment of the charity to providing these services We also draw attention to the position of the National Trust where members are consciously

signing up to a conservation philosophy embodied in the Trust's enabling Act and founding principles. Currently members join English Heritage to access properties rather than signing up to a philosophy and we feel these needs to be addressed to ensure the success of the Charity in its ambitions in the long term.

10. Are the proposed success criteria to measure the performance of the charity and to ensure that the benefits are realised the right ones?

Yes, subject to the caveats mentioned in the response to Question 2 with regard to the assumptions regarding income generation and the reliance on visitor numbers. In line with the response to Question 6 we would also argue that other criteria beyond income and membership should include broadening access for those who may not become a member due to financial or other circumstances, and reiterate the point about heritage belonging to all regardless of ability to pay. We believe that the quality of the heritage should be the primary focus and support the inclusion of the reversal of the decline in the condition of the collection.

11. If not what else should be included in the success criteria

In order to ensure the proposals lead to a net gain for heritage, it is important to assess the impact of the changes on English Heritage in the wider context of the sector as a whole. We recognise this is hard to measure, but would recommend that success criteria for the new body include ensuring non-harmful impacts on the rest of the heritage sector.

Chapter 4: Historic England

12. Views on the proposed future opportunities and priorities for Historic England. Are these the right priorities and opportunities? Is there anything missing?

These appear to be the right priorities and opportunities provided that they include adequate resourcing to be able to continue to support local authority heritage services through the provision of expert advice and research, leading to informed decision making. However, of significant concern is the freeze on all EH grant aid for Buildings at Risk which accompanied the new model proposals. This was despite the assertion in Para. 4 that 'the proposed changes to the management of the National Heritage Collection do not require any direct changes to the rest of the services that EH currently provides'. This change will directly affect the priority for securing Heritage at Risk and have a negative impact on the wider historic environment.

Whilst we welcome the acknowledgement that a lack of attention to the conservation needs of the National Heritage Collection has resulted in a considerable backlog of repairs necessary to maintain these structures, we are concerned that there is no mention of

resources for Historic England to halt the decline for the remainder of England's heritage. What steps will be taken to ensure that the prioritisation of the 420 Scheduled Monuments in the Collection will not be to the detriment of the wider heritage, enjoyed on a regular basis by millions of people?

We are in general agreement with the proposed future opportunities and priorities; however we would question how a more public facing Historic England will "deepen people's desire and ability to care for England's heritage". How will this be delivered in practice? This assumes a grant making capability and grant aid levels beyond those at present. Whilst in agreement with the principle of constructive conservation, we would wish to see a more detailed account of the role that is envisioned for sustainable commercial and economic development in securing a future for England's heritage.

We must also point out that in paragraph 4.9 there is a suggestion that "heritage adapts" whereas it is "our approach to and use of heritage" which adapts to the environment, social and economic needs of the day.

We agree with the principle of making the heritage protection system work better, but we believe that this should be focused on clear positive outcomes for the heritage and the advancement of public knowledge, enabling owners and developers to help achieve these outcomes whilst also securing economic benefits. Whilst accepting the established practice and significant economic contribution of heritage led regeneration, Historic England's main role should always retain a focus on protecting heritage. Whilst we see great synergies between supporting heritage conservation and economic development, it should be made clear that in cases where there is a conflict between the two, heritage needs will prevail. It is not clear from the document whether alternative funding models for Historic England been considered, which could augment the income from the taxpayer.

We generally support the statement set out in 4.13 and we would like to see this as a commitment to improving the important work of Local Authority Heritage Services and developing effective alternative models of securing these services in a landscape of political and economic change. We would caution developing recommendations to ensure that in future we make the best possible use of the resources available may not go far enough and would be keen to engage at a local level with Historic Environment and other relevant Authorities to capture ways this can be achieved and an adequate level of service maintained.

Whilst we welcome the raised profile of Historic England we express some concern as to the resilience of the organisation from future reductions in public funding for heritage protection. This would have a detrimental effect on the ability of Historic England to retain a high level of expertise and its capacity to support the wider historic environment sector in protecting and enhancing our heritage. For example, the current freeze on grant aid for Heritage at Risk due to oversubscription poses a significant risk to Historic England's ability to fulfil its targets within this area.

We recognise that the framework for Historic England is the National Heritage Protection Plan. Currently English Heritage has important responsibilities towards local authorities and National Park Authorities, particularly in providing policy and designation advice and advice on planning applications. It is of concern therefore, that whilst Chapter 4 : Historic England

paragraph 4.10 states that 'Historic England will aim to make the heritage protection system work better for owners, developers and infrastructure providers, for example through.....', no mention is made of similarly making the heritage system work better for local authorities and National Park Authorities in their own role in making the heritage protection system work better.

We welcome the reference in paragraph 4.14 as a more responsive service offered to owners and developers as a key benefit. We would welcome further discussion on how this is to be achieved and in particular how this will affect the current responsibilities towards Local Authorities and National Park Authorities.

We believe that the creation of Historic England should in fact offer an opportunity to consider changes to the duties and responsibilities of the organisation, in addition to reassessing priorities. In particular we consider that it provides an opportunity to consider the inclusion of intangible heritage in the duties and responsibilities of Historic England. The current framing of 'historic environment' prioritises tangible and physical heritage and neglects England's rich intangible or non-physical heritage. Duties and responsibilities framed around 'cultural heritage' would be more inclusive, recognising that the heritage of a particular site, artefact or place has both tangible and intangible aspects. This would remove the current artificial barrier that exists between the two, and assist partnership working with those who seek to conserve the less tangible aspects of heritage.

13. Are the proposed success criteria to measure the performance of Historic England the right ones?

Yes.

These are appropriate success criteria but the principal criteria should be a better protected, conserved and appreciated historic environment.

14. If not what else should be included in the success criteria

N/A

15. Should the National Heritage Protection Plan form the basis of the business plan for Historic England?

Yes

16. If no – why not?

N/A

17. Are there any further points you would like to add in relation to the consultation?

We welcome the acknowledgement of the role of the state in securing heritage - both the National Heritage Collection and its repair and maintenance; and for the wider historic environment. We remain eager to engage constructively to ensure the best possible outcome.

We would ask for assurances that both the charity and Historic England will sign up to the Joint Statement on the Historic Environment in National Parks (available on request from National Parks England). The Joint Statement is the expression of the intention of the signatories to invest in collaborative and partnership working for the sustainable management, public understanding, access to and enjoyment of the rich historic environment of the National Parks. Under the Joint Statement agencies support National Park Authorities in the preparation of bids for resources to pursue initiatives relevant to the historic environment.

We are supportive of the creation of two organisations: in respect of English Heritage, the opportunity to attract investment and plan long term for earned income and in respect of Historic England, the continued constructive conservation approach and demonstrating that heritage is fundamental to sustainable economic development. It is also essential that both organisations continue to seek the recognition of the importance of heritage to the well being of the country, economically and socially, at a high level politically.

We would ask for clarity on the role of the Commissioners who oversee the work of the Charity. After the period of eight years has elapsed, will the charity remain responsible to the Commission if the new model continues? Detail on how a clear governance link between the Commissioners and the new charity is considered important.

As a public body English Heritage currently has a duty to have regard to the statutory purposes of National Parks and The Broads (relevant legislation being Section 11A(2) of the National Parks and Access to the Countryside Act 1949 as amended by Section 62(2) of the Environment Act 1995; Section 17A of the Norfolk and Suffolk Broads Act 1988 as inserted by Section 97 of the Countryside and Rights of Way Act 2000). It will be important that the strong links that this duty has contributed to are maintained, for example through early sign up by the charity and Historic England to the Joint Statement mentioned above; and maintaining strong links with individual NPAs locally as well as at a national level.

We look to English Heritage / Historic England for a commitment to continue our work together to ensure that “the conservation of the Parks’ outstanding cultural heritage is secured for future generations”, as set out in the ‘Relationships with Key Public Bodies’ section of the English National Parks and The Broads UK Government Vision and Circular. We look forward to contributing to any further discussions on the new model for English Heritage / Historic England.