



National Parks England Response to DCMS Tailored Review of Historic England

7 May 2019

Introduction

National Parks England (NPE) welcomes the opportunity to provide input to the Tailored Review of Historic England. We support the policy-making process by coordinating the views of the nine English National Park Authorities and the Broads Authority (hereafter referred to together as NPAs). NPE is governed by the Chairs of the ten Authorities, and our response represents the collective view of officers who are working within the policies established by the NPAs and follows internal consultation amongst officers. As Authorities we have a significant role as place shapers, working alongside our rural communities, and we are happy to provide additional information as necessary.

Summary

1. National Parks in England are cultural landscapes. They are Category V protected areas in the IUCN classification as landscapes shaped by rural and human interaction. As such, the historic environment represents a key aspect of the 'Special Qualities of our National Parks'.
2. Historic England plays a critical role in the informed conservation of the historic environment and in increasing awareness and promoting public understanding and enjoyment of the historic environment and protecting important heritage. Historic England does not work in isolation; there are strong synergies between these roles and the Statutory Purposes of the National Parks, and they should be continued.
3. Historic England's role in ensuring the historic environment is represented in policy across government is essential, and this role should be strengthened so that Historic England is both involved in and sought after when developing policy that pertains to the historic environment. Historic England also plays an important convening role in respect of direction and joint working on historic environment, e.g. through Historic Environment Scotland.
4. The historic and natural environment go hand in hand, no more so than in our national parks, and are not competing alternatives. Both contribute to our wellbeing and quality

of life, and Historic England plays an important role in ensuring both the natural and historic environment are addressed in a comprehensive way.

5. Historic England's management of the Capacity Building Grants scheme is crucial to the work of conservation, advancing understanding, and promoting enjoyment. This is a shared objective in the National Parks Joint Statement on the Historic Environment, which is a joint statement and action plan agreed by all 15 UK National Parks and Historic England, as well as Historic Environment Scotland, Cadw, and Natural England. National Park Authorities, and the heritage sector more broadly, would face significant challenges in delivering their functions without resources for capacity building. We highly value the ability to draw upon specialist expertise in this area.
6. The research functions of Historic England are particularly important, and have provided significant benefits to the National Parks, especially in the area of archaeology. This is a shared objective in the National Parks Joint Statement on the Historic Environment. Historic England's research functions are essential in that they do not duplicate those of universities and are importantly focussed on applied rather than theoretical research, which directly supports HE's other statutory functions.
7. Nationally, NPAs work very well with Historic England through the Joint Statement, however we believe there is scope for closer and more effective partnership working between Historic England local teams and National Park Authorities, particularly in the delivery of our shared ambitions set out in the Joint Statement.

Detailed Responses to Survey Questions

Do you agree that the following functions are required (as set out in the National Heritage Act of 1983 and amended in 2002)?

a) To secure the preservation of ancient monuments and historic buildings

Yes - There is still a need for a body such as Historic England to champion the preservation of the historic environment. Although the term "preservation" does not take into account the sensitive management of change, rather "informed conservation" is more current and reflects the need of ancient and historic places to make a positive contribution to landscape and society. We feel that the Heritage at Risk programme has been a particularly powerful means of helping drive positive change.

b) To promote the preservation and enhancement of the character and appearance of Conservation Areas

Yes - Promote is an accurate term as there is a need for a body such as Historic England to promote, raise awareness and work in partnership with other key stakeholders to secure the future of conservation areas as places that provide historic, informative, inspiring, and

attractive places for people to live and work in and to help to promote good practice in respect of such places.

c) To promote the public's enjoyment and advance their knowledge of ancient monuments and historic buildings.

Yes – There is a need to promote public enjoyment and advance their knowledge of the historic environment (which includes ancient monuments and historic buildings). Grants available to local groups are invaluable in furthering their appreciation, skills, and research into local areas. Terms such as “ancient” are not current but do serve to distinguish those monuments of great antiquity. This also accords with the “virtuous circle” of valuing – understanding – enjoying – caring for heritage.

In your view, what type of organisation is best placed to deliver the above functions?

We would recommend that a body at arm's length from Government, yet with the ability to inform and influence Government policy, is best placed to deliver these functions in the national interest. The historic environment is a capital asset which has tangible public benefits and forms part of a national inheritance from the past for current and future generations to enjoy. This does not preclude delivery of certain functions by other means, be they through the charitable or private sectors, but overall responsibility must rest with an independent body empowered to advise Government on policy and strategy unencumbered by vested interests.

Should Historic England continue to be the sole member of the English Heritage Trust?

Yes – Oversight and accountability should remain with a public body in the national interest. We support the work of the English Heritage Trust and recognise the benefits of this model for the management of the collection.

Are the Historic England governance arrangements in relation to English Heritage effective (fit for purpose and compliant with principles of good governance)?

Yes – The current arrangements appear to be accountable, transparent, independent, have integrity, clarity of purpose and are effective.

Should Historic England continue to monitor the management of the NHC undertaken by English Heritage?

Yes – in line with the principles of good governance.

Do Historic England provide appropriate assurance of the management of the NHC undertaken by English Heritage?

Yes – as a public body which works in the national interest.

Historic England's duties, powers, and functions.

- (I) Advise DCMS on the National Heritage List (Listing of Historic Buildings)**
 - a. Does this activity link to the overall statutory purpose?**
 - i. Yes
 - b. Is this activity still required by government and the public?**
 - i. Yes
 - c. Could it be delivered by an alternate organisation?**
 - i. Possibly, but it is unclear what type of organisation could do this in the wider public interest and with the same levels of public accountability.
 - d. Is it effectively and efficiently delivered by HE?**
 - i. We do not have enough detail to make an informed comment.
- (II) Advise DCMS on the scheduling of monuments, the designation of Historic Wrecks, the designation of Historic Battlefields, the designation of Historic Parks.**
 - a. Does this activity link to the overall statutory purpose?**
 - i. Yes
 - b. Is this activity still required by government and the public?**
 - i. Yes
 - c. Could it be delivered by an alternate organisation?**
 - i. Possibly, but decisions need to be taken independently and in the public interest, be transparent and publicly accountable.
 - d. Is it effectively and efficiently delivered by HE?**
 - i. We do not have enough detail to make an informed comment.
- (III) Management of the National Heritage List**
 - a. Does this activity link to the overall statutory purpose?**
 - i. Yes
 - b. Is this activity still required by government and the public?**
 - i. Yes
 - c. Could it be delivered by an alternate organisation?**
 - i. Possibly, but decisions need to be taken independently and in the public interest, be transparent and publicly accountable.
 - d. Is it effectively and efficiently delivered by HE?**
 - i. As above.
- (IV) Public Engagement (campaigns, exhibitions, events) to promote the historic environment.**
 - a. Does this activity link to the overall statutory purpose?**
 - i. Yes
 - b. Is this activity still required by government and the public?**
 - i. Yes
 - c. Could it be delivered by an alternate organisation?**
 - i. Possibly.
 - d. Is it effectively and efficiently delivered by HE?**

- i. As above
- (V) Promoting diverse and inclusive heritage.**
 - a. Does this activity link to the overall statutory purpose?**
 - i. Yes, absolutely.
 - b. Is this activity still required by government and the public?**
 - i. Yes, to promote and champion heritage, its link to public identity, engagement and well-being.
 - c. Could it be delivered by an alternate organisation?**
 - i. No, not the high-level promotion and championing. This needs to be done by Historic England but in a way that actively supports others to deliver, aligns with national, regional and local heritage promotion and aligns with the work of English Heritage.
 - d. Is it effectively and efficiently delivered by HE?**
 - i. The role of Historic England in supporting the national and regional Historic Environment Forums is very effective in promotion of heritage, its impact and value.
- (VI) Provision of planning advice to Local Authorities and Developers.**
 - a. Does this activity link to the overall statutory purpose?**
 - i. Yes. As often local authorities require a wider perspective of specific expert opinion.
 - b. Is this activity still required by government and the public?**
 - i. Yes.
 - c. Could it be delivered by an alternate organisation?**
 - i. No, not without losing the benefits of an independent and expert public body working in the national interest. Whilst others might provide expert advice a consistent approach may suffer.
 - d. Is it effectively and efficiently delivered by HE?**
 - i. As above.
- (VII) Provision of advice on Placemaking.**
 - a. Does this activity link to the overall statutory purpose?**
 - i. Yes.
 - b. Is this activity still required by government and the public?**
 - i. Yes.
 - c. Could it be delivered by an alternate organisation?**
 - i. No, not without losing the benefits of an independent public body working in the national interest. Place making is in effect delivered by others as it relies on a number of partners, owners, local authorities, civic societies and local communities working together. Historic England brings unique experience to such partnership working.
 - d. Is it effectively and efficiently delivered by HE?**
 - i. As above – it would appear that this is an area where Historic England could be better resourced to deliver.
- (VIII) Management of a Repair Grants Scheme for heritage at risk.**
 - a. Does this activity link to the overall statutory purpose?**

- i. Yes.
 - b. Is this activity still required by government and the public?**
 - i. Yes.
 - c. Could it be delivered by an alternate organisation?**
 - i. Funder of last resort. National Parks Authorities and other local authorities could deliver this function but would require significant resource to do so as part of delegated functions and would still require close liaison with, and support from, Historic England.
 - d. Is it effectively and efficiently delivered by HE?**
 - i. As above.
- (IX) Management of Placemaking Grants Scheme for conservation areas.**
- a. Does this activity link to the overall statutory purpose?**
 - i. Yes.
 - b. Is this activity still required by government and the public?**
 - i. Yes.
 - c. Could it be delivered by an alternate organisation?**
 - i. Funder of last resort. National Parks Authorities and other local authorities could deliver this function but would require significant resource to do so as part of delegated functions.
 - d. Is it effectively and efficiently delivered by HE?**
 - i. No comment
- (X) Management of a Capacity Building Grants Scheme.**
- a. Does this activity link to the overall statutory purpose?**
 - i. Yes.
 - b. Is this activity still required by government and the public?**
 - i. Yes. This is crucial in the role of Historic England to champion the conservation, protection and advancement of knowledge and understanding and promoting enjoyment. There are particular challenges facing the heritage sector and without resources for capacity building, Local Authorities and National Park Authorities would face significant challenges in delivering their functions.
 - c. Could it be delivered by an alternate organisation?**
 - i. As above.
 - d. Is it effectively and efficiently delivered by HE?**
 - i. As above
- (XI) Management of a Research Grants Scheme.**
- a. Does this activity link to the overall statutory purpose?**
 - i. Yes.
 - b. Is this activity still required by government and the public?**
 - i. Yes, particularly now Historic England is a research body and can draw in additional funding to support this work. The reduction in resources to conduct research and to support the wider heritage sector is of serious

concern. This is also a shared objective in the Joint Statement for National Parks.

c. Could it be delivered by an alternate organisation?

i. As above.

d. Is it effectively and efficiently delivered by HE?

i. As above.

(XII) Historic England Research Functions

a. Does this activity link to the overall statutory purpose?

i. Yes.

b. Is this activity still required by government and the public?

i. Yes, particularly now Historic England is a research body and can draw in additional funding to support this work. The reduction in resources to conduct research and to support the wider heritage sector is of serious concern. This is also a shared objective in the Joint Statement for National Parks.

c. Could it be delivered by an alternate organisation?

i. No comment

d. Is it effectively and efficiently delivered by HE?

i. No comment

(XIII) Management of (including maintain public access to) an archive of photographs and documents relating to historic building and sites.

a. Does this activity link to the overall statutory purpose?

i. Yes.

b. Is this activity still required by government and the public?

i. Yes. There is clearly a move to support local records but there remains a need for a national archive. Initiatives such as HIAS (Heritage Information and Access Strategy) can support local records centres (Historic Environment Records), but there remains a need for a central repository to avoid splitting collections across numerous regional or specialist archives.

c. Could it be delivered by an alternate organisation?

i. As above.

d. Is it effectively and efficiently delivered by HE?

i. As above.

How effective is the preservation of the wider Historic Environment by Historic England?

Historic England has provided good support for Conservation Areas and their work on assessments of assets and landscape has been invaluable, e.g. Rapid Coastal Zone Assessments and Historic Landscape Characterisation. This area of work could be widened.

Additional focus by Historic England on important undesignated sites would also be welcomed, as many aren't getting sufficient attention and are generally at more threat from development and other pressures.

Are you aware that Historic England use a Heritage at Risk Register to monitor the state of the Historic Environment?

Yes, we are aware of this. The Heritage at Risk register is a valuable tool for helping to prioritise work and for detecting trends. This statistic is widely understood and used by many other organisations as a performance indicator.

Is this Last Resort role appropriate for Historic England?

Yes, this is appropriate as the Government's agency responsible for caring for, championing, and promoting the care of the historic environment.

Is the Historic England strategy appropriate for its functions?

Yes, it is appropriate.

Does the Historic England strategy align with the statutory purpose?

Yes.

How well does Historic England work with partners across the heritage and cultural sectors?

Overall, very well with National Park Authorities, through the Joint Statement. This is evidenced by regular meetings, through joint policy responses and through joint projects, such as the delivery of the Traditional Farm Building pilot grant scheme.

Locally, there have been more mixed experiences. In some instances, partnership working at a local level has been less effective given the priorities of Historic England since 2015. However, it is too early to tell how effective the recent restructuring of local teams and offices will be. In other cases, there has been good coordination and support, particularly through the Monuments Management Scheme, Capacity Building funding, and Section 17 management agreements. Historic England has also been very supportive to Local Authorities that have seen reductions in historic environment staff, and the HELM training courses provided by Historic England have been widely appreciated.

We believe Historic England staff to be extremely knowledgeable, highly skilled and with significant experience of the management of the historic environment. As such its staff are assets of considerable value to this organisation. We believe there is scope for closer and more effective partnership working between Historic England local teams and National Park Authorities, particularly in the delivery of our shared ambitions set out in the Joint Statement.

Have you as an individual or organisation applied for funding from Historic England in the last three years?

National Park Authorities have benefitted from capacity building grants (in Exmoor National Park, for example) and the funding of a Project Manager for the Traditional Farm Building Grant Pilot.