The Rt. Hon. Ed Vaizey MP,
House of Commons,
London,
SW1A 0AA

9th December 2015

RE: Evidence submission to inform the Culture White Paper

Dear Mr Vaizey,

I am writing to you on behalf of the Council for British Archaeology (CBA) in response to the call for evidence to inform the Culture White Paper. Our comments relate to the value of archaeology and the historic environment, both of which are key contributors to the vibrancy of this nation’s culture. We see the White Paper as an opportunity to set out the broad principles which underpin the importance of culture and heritage to our society and its place in policy, including its contribution to the four themes of this consultation and their impacts upon economic sustainability, social well-being, and positive place-making.

In this response we would like to discuss these principles in a context which recognises the existing structures for service delivery and the challenges faced in the current climate of austerity. We also want to look towards opportunities to implement innovative changes to these systems, which we believe it is possible to do, even in the present context of pressing economic challenges. A strong commitment from government through this White Paper to the value of culture and heritage, and recognition of the need to act to maintain systems of heritage protection would give confidence to the cultural sector and help to inspire a coordinated response to assist in any transition to new ways of working.

That being said, the current situation facing many archaeological and wider heritage services is one of unsustainable decline in a system which is mostly acknowledged to function well, where adequately resourced. We wish to underline our commitment to the need for a baseline support for existing services, for example, to secure the operation of historic environment records and provision of specialist archaeological advisors, conservation officers, and wider heritage specialists, as well as museums, to ensure the continued delivery of a strong public benefit.

There may be opportunities to change how this system is delivered; to increase efficiency and effectiveness while maintaining protections, and enhancing access. In this response we provide some ideas for how this might be achieved by setting out a vision for positive change in the management of culture and heritage. In order to set out this vision in a realistic way, we also confront the current processes of decline in historic
environment services and protections which must be arrested if significant harm is not to befall the historic environment in its current fragile state.

The following sections consider the contribution made by archaeology and heritage to the four themes highlighted in the consultation. We draw out what we believe are core principles in each case, and highlight challenges to the achievement of benefits in relation to these principles, and potentials to improve, in each case.

**About the CBA**

The CBA is the national amenity society concerned with protection of the archaeological interest in heritage assets. We have a membership of 620 heritage organisations who, together with our thousands of members, represent national and local bodies encompassing state, local government, practitioner, academic, museum and voluntary sectors.

We believe that archaeology should be accessible for people; a physical and intellectual resource which enables people to understand their relationship with the past through the physical environment and in our cultural practices; enhance their sense of place and foster unique identities; enable and inspire people to get involved with protecting heritage; and promote sustainable practices of management of the historic environment.

**Vision**

The ultimate vision for the historic environment is one in which efficient, effective and sustainable management of the archaeological and heritage resource can be facilitated through effective joined-up systems for information sharing and a strategy for the achievement of public value. These systems should be underpinned by strong mutual understandings of the value of culture and heritage developed through partnership working across the wide range of stakeholders who care for heritage and the historic environment, including; national and local government (including planning and place-making, cultural, and community services), the third, voluntary, and private sectors, and the public. The structure of this White Paper has the potential to set out a framework for this strategic vision and to recognise the issues which currently impede progress towards these goals under the following four themes.

**Places**

The historic environment underpins people’s conception of place in every city, town, and rural locale in the country. Every place has its own historic significance, whether or not it contains great examples of nationally listed buildings, scheduled ancient monuments, or conservation areas. Archaeology and heritage should thus be considered to be contributors to any place-making agenda. The CBA is committed to greater
integration of historic environment protections within place-making and the joining-up of aims for how we create vibrant places and healthy communities for people to live and work.

Understanding the past is an important first step in creating unique places. This should underpin plan-making at a local and neighbourhood level. A strong national vision for this would help local authorities to commit to this approach. Whether the Government is exploring these issues through such avenues as implementing the conclusions of the Farrell Review of Architecture and the Built Environment, or through legislative initiatives such as the Direct Planning (Pilot) Bill, we would like to see the historic environment’s contribution explored and included.

The benefits of heritage to places are numerous: Historic buildings are generally perceived to be more attractive, with historic towns consistently judged to be among the nicest places to live in the country, with higher scores for quality of life, even when adjusted for other factors (e.g. Fujiwara for DCMS 2014). Historic buildings are often prized for use by businesses, command higher rents and property prices in the private sector for both commercial and residential uses. This in turn promotes investment, attracts businesses, tourists, and generates local wealth (e.g. Heritage Counts 2010). Historic places make people happier (Historic England 2014) and open spaces in towns and the British countryside generate health benefits for people who experience them (e.g. Countryside Recreation Network 2005, Mind 2007). These are some of the effects of the heritage which is also fiercely defended at the core of people’s identity, as well as being attractive to tourists who visit the country.

In order to ensure the maximisation of these benefits, systems to understand and protect heritage assets must be effectively maintained. To this this end it is important to note that over 90% of heritage assets are not nationally designated. These sites represent the richness of the cherished local scene and contribute in a large part to what makes places interesting. These sites in particular rely upon the planning system for their protection and their integration into place-making. There are several services which, in the current context, need to be highlighted for the contribution they make to these benefits and for the place they would no doubt play in the delivery of the stated vision. These are: (1) Local authority specialist archaeological advisors; (2) historic environment records (HERs); and (3) systems of archaeological archiving.

Local authority specialist archaeological advisors enable the local authority to lever in funding from developers which supports place-making aims by better protecting and enhancing the historic environment’s contribution to place. Research shows that each post can bring in 30 to 40 times the cost of employment in private contributions to enhancing knowledge of the local historic environment, from which people directly benefit. Advice from archaeological officers should support clear place-making strategies so that new development contributes to the enhancement of places which respect heritage but also the present and future needs of the built and natural environment. Historic England’s Constructive
Conservation philosophy exemplifies this approach, as well as the 2014 Farrell Review of Architecture and the Built Environment, which similarly located a commitment to conservation in this way.

The primary resource which enables experts to give effective advice is the Historic Environment Record. These databases should be developed to be at the heart of decision-making about place. In recent years digital access and public engagement with HERs has seen many positive and innovative advances, but there is a great potential yet to be realised, using these tools as a central focus for authorities, developers and the public to explore the meaning and historic significance of places.

Finally is the material archive of archaeological material, which exists to preserve both a research potential and public engagement opportunity for the physical remains which result from developer-led archaeological excavation. There is currently a serious sustainability problem in the present processes for the storage of archaeological archives and the provision of access to them. The issues of funding for archive centres and museum stores need to be addressed urgently and we would welcome a strong statement from government in the White Paper committing to solving these issues.

Highlighting the need to preserve the function and contribution of these historic environment services within the planning system and enhancing the integration of the historic environment into national and local visions for place-making should be key goals of this White Paper.

Arguably, there are potentials for planning to work better towards these goals. Clearer recognition at the highest level of the importance of heritage to wider place-making and not simply in the protection of designated assets would be generally beneficial. An example of where this works well is DEFRA’s Environmental Stewardship schemes, which represent one of the most forward looking approaches to how landscape management can integrate various aspects of broad significance of place in one unified system. A similar approach to urban planning processes would encourage better understanding and more joined-up benefits for place.

To facilitate this development the CBA recommends that the government looks to enable renewed discussion of these principles, drawing on the existing UK commitment to the European Landscape Convention and further considering the potential ratification of the Council of Europe’s Framework Convention on the Value of Cultural Heritage for Society (Faro Convention). These conventions stress the importance of a holistic approach to landscape and place which is explicit about the contribution and value of the historic environment to society. The CBA would respond positively to government support for a sector-led discussion of these conventions.

As well as examining the principle of the cultural and heritage contribution to place-making, there are a number of critical infrastructure challenges which will impact on these ambitions: The preservation of the function of HERs and the capacity of historic environment specialist advisors is vital for the achievement of
better place-making. It is 25 years since the establishment of comprehensive protection for archaeology within the planning system, and it is concerning that some areas of the country are beginning to fail in their responsibility to deliver adequate development control advice. The sector has for years advocated for a statutory footing for historic environment services to protect this advice and the benefits that it facilitates, along with the developer funding that it brings in.

The CBA is willing to consider that long term potential solutions to these issues may require radical changes to the way these services are delivered. Discussions about information systems and data sharing between national and local levels may provide the impetus to change systems of information management, with potentials for better national access points, supported by more uniform local data structures, although still respecting local self-determination and differences of approach. The emphasis in considering these changes should be on providing a cost effective, sustainable, and resilient system, but also one which can capitalise on opportunities to develop access to resources and benefits which result from better organisation (i.e. to make systems easier to navigate for developers) and increasing the range of uses available to the public.

Of course, any such changes would need to be carefully researched and would require funding to pump-prime the initial transition, but such changes could allow local authority resources to be focused more helpfully on the creation of benefits in other areas, such as supporting localism, community, and place-making objectives – particularly given the collapse of provision of these types of public services under current systems where resources are being cut.

The CBA also supports the work of the Historic Environment Forum (of which CBA is a member) in developing technical changes to the system to work towards these goals of greater efficiency and effectiveness and we trust that these proposals will be considered by government for contribution to the system.

There are a number of positive examples of innovative responses to the critical infrastructure challenges currently being faced by many local authorities. Worcester City Council and Worcestershire County Council have worked together to develop a jointly managed hub for heritage and archive services and have sought to mitigate decline in resources by diversifying their consumer offer, creating a critical mass within a joined-up service. In Nottingham, the City Council have aimed to provide a strong strategy in order to enhance funding bids and the philanthropic success of heritage projects in the city and have stimulated voluntary sector buy-in to the process by setting up several mechanisms for third sector and community steering of investment in conservation and public engagement programmes, facilitating easier access to external grant funding, and achieving greater added-value and local ownership of the urban environment. In Bristol, an integrated urban design team have sought to embed heritage principles in wider approaches to place-making and have created innovative tools for public contribution to the HER and to plan-making. We would welcome if the White Paper aimed to showcase these types of innovative local solutions to present issues of historic environment service delivery, or indeed any statement which could support a greater
engagement between the historic environment sector (led by Historic England) and local authorities to further debate these issues of service delivery.

**People**

The importance of culture and heritage to people should be at the very heart of the Government’s vision for the White Paper. Chief among the principles underpinning this are (1) the contribution of heritage to social well-being; (2) access to, and opportunity for participation in, cultural heritage activities; (3) the promotion of cultural understandings; and (4) the potential for social benefits which arise from engagement with culture and heritage, for example, poverty alleviation, and education.

The archaeology sector has pursued, in recent years, numerous programmes which have demonstrated the important social benefits that access to and participation in heritage can bring. Directly involving people in archaeological projects can help them to gain transferable skills and confidence which they can use to engage socially or in the workplace. For instance, archaeology has been used as a medium for working with ex-convicts, the homeless, injured servicemen, and young ‘NEETs’. Providing people with a sense of ownership in the past and a connection to it can help to break down barriers of social exclusion and the therapeutic effects of these types of engagement can be personally enriching for participants (e.g. Andrews 2014). Heritage has also been used as a tool to help alleviate effects of poverty in some communities. For example, recent research has shown that heritage benefits people to the equivalent cash value of more than £1000 per annum for those participating in heritage projects.

Archaeology is also a fruitful window through which to examine modern social issues. For example, archaeology offers a medium through which to discuss such topical issues as immigration and cultural identities which can be used to give people broader understandings on current issues, and help break down social perceptions of cultural difference and understanding in the modern world.

Most crucially, well-being is a critical concept for all people, and promoting its achievement through culture should be an important aim of government policy (https://historicengland.org.uk/news-and-features/news/heritage-makes-you-happy). Local authorities, however, are finding it increasingly difficult to deliver this kind of public-focused service and, even more than in the core work of development control in the planning system, are less and less able to ensure adequate consideration of well-being within local heritage programmes. Tools such as local heritage listing, facilitation of local archaeological projects, and education and outreach are all threatened under the current system in the context of declining resources. As above, we feel that strong government guidance on the benefits of heritage to culture to well-being could be important to ensure that efforts to join-up programmes which promote social or community benefits with those that promote heritage.
The Heritage Lottery Fund and other National Lottery distributors have already created enormous cultural benefits in these areas and should have the full support of government to continue to fund these projects with a full share of Lottery money. However, a more co-ordinated approach from government to supporting this type of engagement would likely help to encourage local authorities to put more effort into exploring partnerships with third sector bodies, community interest companies, and other voluntary interests to ensure that positive social engagements remain possible as local government capacity is reorganised.

To this end the CBA would like to see a greater commitment from national government to highlighting the potential of partnerships and community-led heritage initiatives; from neighbourhood planning, to community-driven local listing, greater use of village design statements, community asset transfer of heritage assets, local stewardship, and historic landscape characterisation, involving the community and other local voluntary or charitable interest groups.

**Financial resilience of cultural institutions**

In the current climate, as discussed, the financial sustainability of organisations, whether publicly funded (e.g. local authority museums, historic environment advisors), charitable (e.g. museums trusts) or private sectors (e.g. outsourced HER services) are all facing decline – some unsustainably so.

Philanthropy will play a part, no doubt, with greater funding potential to be unlocked if Government reformed tax incentives for donors along the lines of systems in operation in the United States. This type of funding is, however, not likely to be accessed readily in the near future and will not be an appropriate form of funding for many heritage services. Local authority services may have the potential to generate more money to cover costs through charging for advice, or through diversification to offer other chargeable services. Historic environment advice is often undermined by existing payment structures in local authorities, with money from developers (via planning fees, section 106, or Community Infrastructure Levy) not necessarily being channelled to support the historic environment advisors, or with internal advice being additional to charged services. For instance, whilst applying for listed building consent may generate a planning fee, advice provided by an archaeological specialist on a non-scheduled site may not be chargeable. Similarly, for a heritage specialist to advise on the impact of development on a historic townscape, there may be no suitable mechanism to cover the costs of that advisor even though this activity is vital to the maintenance of a vibrant built historic environment.

We understand that there is a wide variance across the country in how these core roles are funded, with some services struggling to maintain core contributions to budgets which match the level of their advice. We also wish to stress that funding for archaeology or conservation advice is a perfectly legitimate use of s.106 or the Community Infrastructure Levy (CIL), and that this should be made explicit to local authorities who currently do not explicitly divert S.106 or CIL money to these services.
Evidence from the British Property Federation (BPF) has also consistently suggested that many developers would be willing to pay more in order to ensure an effective and consistent system – with many developers currently frustrated by under-resourcing in local planning departments causing delays (BPF et. al. 2013). As a point of balance, however, there are some areas of the country where margins are so slim that there is little potential for extra charging.

The CBA also support the long-term sector campaign to reduce the VAT level on repairs and maintenance of historic buildings to 5%, in line with VAT on new build, as a way to ease the burdens on private owners who together are responsible for protecting in excess of 90% of Britain’s stock of listed buildings. We support the actions of the Heritage Alliance and the Cut the VAT campaign, in particular, to this end.

Fundamentally, there is no one system which has the potential to fully relieve Government financing of core historic environment or wider cultural services. Every effort should be made to ensure that greater philanthropic giving is harnessed, more effective income generation is achieved, and greater voluntary contribution enabled, but a recognition that the final responsibility towards core protection of culture and heritage rests with government is important. A case in point is the need to preserve central government funding to the Portable Antiquities Scheme (PAS) to maintain the network of Finds Liaison Officers who underpin the facilitation and management of the 1996 Treasure Act – a process which has produced world class finds such as the Staffordshire Hoard and which has revolutionised the practice of finds recording in the UK.

More widely, government funding for heritage must be preserved particularly in geographical areas where the potential to generate alternative forms of income is lower, but where small investments in place-making and programmes to enhance social well-being may create the largest benefits. Government should therefore have a particular interest in these depressed areas of the country (most often in the north and west), as well as deprived areas in other towns and cities.

**Cultural institutions abroad**

Culture does not exist in a vacuum, and so it is that our cultural heritage is also something through which we display British identities and develop reputation abroad. Our cultural and heritage offer is one of the most important factors in people’s decision to visit Britain and is a significant draw for potential investors (e.g. VisitBritain 2013). For these reasons cultural and heritage tourism is undoubtedly vital to our international economic interests.

Britain, however, also has a responsibility to the wider world to play its part in cultural protection abroad, an issue which the government recently recognised by committing to ratify the 1954 Hague Convention for the Protection of Cultural Property in the Event of Armed Conflict. Further international best practice for the study and protection of archaeology and heritage also exist in the form of the 2001 UNESCO Convention
Concerning the Protection of Underwater Heritage, and the aforementioned Faro Convention – both of which the CBA would welcome the government to consider the benefits of ratifying. Britain has a reputation as one of the pioneers in the field of archaeology and has, in the past, led the world in the development of regulatory protections for cultural heritage. As a point of national pride, Britain should be stepping up in the international arena to ensure that it maintains this reputation and can take a leadership role in the 21st century exploration of themes of cultural heritage, identity, and cultural property protection; developing the role, remit, and significance of archaeology, and cultural heritage in the European Union, Commonwealth, and the wider world.

Conclusions

The context for the White Paper is one in which culture and heritage is in decline in many places due to adverse economic implications. Now, more than ever, we would welcome a strong principled statement from government underlining the roles that culture and heritage have to play in the enhancement of place-making, well-being, and localism, as well as issuing support for the delivery of services which maintain the historic environment as part of the planning system, and in museums. There are opportunities to do this and explore how heritage can contribute and add value to systems as well as ensure economic efficiency and resilience and more diverse and sustainable funding models.

We look forward to the results of this process and would welcome further dialogue with DCMS on these issues and will gladly provide further evidence or discuss ideas in more detail if requested to do so.

Yours sincerely,

[Signature]

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