7 February 2014

Dear Project Team

ENGLISH HERITAGE NEW MODEL

The Council for British Archaeology is pleased to have an opportunity to comment on the Government’s plans for the future of English Heritage.

The Council for British Archaeology is an educational charity working throughout the UK to involve people in archaeology and to promote appreciation and care of the historic environment for the benefit of present and future generations. We have a statutory role as one of the national amenity societies consulted on listed building proposals. Our membership includes over 620 heritage organisations, representing national, regional and local bodies encompassing state, local government, professional, academic, museum and voluntary sectors, and over individual 10,000 members.

Our response was discussed and agreed by CBA trustees on 24 January 2014.

Our answers to the specific questions are given below:

The Charity

1. The consultation outlines the benefits of the new model for the National Heritage Collection. Do you (please tick the appropriate box)

Strongly agree with the proposed benefits
Somewhat agree with the proposed benefits **
Somewhat disagree with the proposed benefits
Strongly disagree with the proposed benefits
Neither agree or disagree
Don’t know
2. If you either strongly or somewhat disagree with the proposed benefits why is this?

We “somewhat agree with the proposed benefits”, mostly due to the proposed £80m investment from Government which is much-needed and to be welcomed, particularly in the current economic situation, but at the same time we have significant concerns about details of the longer-term future of the National Heritage Collection. Without access to the detailed business plan for the proposed charity which will run the Collection it is difficult to be more positive, but the long-term conservation needs of the Collection need to be safeguarded, and the charity needs protection from situations like another outbreak of foot and mouth disease across the country which would decimate its business plan for revenue generation from visitor numbers.

We understand that it is proposed to review the performance of the charity in 2019 with no guarantees that the arrangements will continue beyond that date. We suggest that the criteria for the review should be agreed with the heritage sector and that financial performance should not be considered to be the most important criterion, but rather the performance of the charity should be judged against its own charitable objectives. The review should involve a public consultation.

The removal of the taxpayer subsidy for the management of the Collection after 2022/23 could leave these sites vulnerable – particularly if there are further cuts to the funding of Historic England. Contingency plans should be drawn up to cover possible risks which may impact on the Collection.

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

The CBA agrees that in principle there are potential benefits to the proposed model, particularly as the two elements of the current English Heritage business each have a completely different focus. However, there are also many synergies across the current organisation and it will be important to look for mechanisms to retain these in the new arrangement.

Also, the constitutional and governance arrangements need to be clarified for the two bodies as we are unclear about the implications of the proposals for several Commissioners to sit on the board of trustees for the charity which could lead to clear conflicts of interest in both directions. A strong independent charity must make its own selection of Trustees, though having been on the predecessor body will represent valuable experience for Commissioners wishing to apply to be Trustees.

Both organisations need strong a visionary leadership, working for the benefit of the unique historic environment of England, to deliver maximum public benefit whilst at the
same time safeguarding our heritage protection systems and the National Heritage Collection for the benefit of current and future generations.

Additional guarantees about future funding models would be beneficial to long-term planning, more along the lines agreed recently by Government with the Canals and River Trust.

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

Yes  
No  
**Don't know**

5. If yes what are they?

Without access to the business plan for the charity it is hard to say. We have concerns about increased competition with other heritage and conservation charities in England who are all seeking additional funding to manage and sustain heritage visitor attractions and other key heritage sites.

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

It is important that the charity retains the ability to add properties to the National Heritage Collection, preferably with additional funding secured as required.

The sites in guardianship which make up the National Heritage Collection were never selected to make up a representative ‘collection’ in any sense. The Collection should therefore have an ambition to ensure that it contains sites which represent the heritage interests of all sectors of the community – although this must be a decision for the trustees of the charity given available resources.

The charity should retain the current service to provide free educational visits.

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

Without access to the business plan for the proposed organisation and detailed scoping of its proposed management and operations it is impossible to answer this question.
8. Do you agree that the suggested charitable objectives are broadly the right ones?

Yes
No **
Don’t know

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

We believe that the long-term conservation and responsible management of the National Heritage Collection should be the key objective of the charity. The second objective about advancing public knowledge and enjoyment of the National Collection should be couched more broadly so that it covers the context for the sites within the Collection.

10. Are the proposed success criteria to measure the performance of the charity and to ensure that the benefits are realised the right ones? (please tick the relevant box)

Yes
No **
Don’t know

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

The removal of the need for taxpayer subsidy of the management of the Collection after 2022-23 is not the appropriate key success criteria for the charity. Instead, the maintenance of the sites in good conservation order should be the key aim – not just reversing the decline in their condition. The charity should be required to produce an annual conservation plan for the heritage assets in their care which makes it clear.

A secondary success criteria for the organisation should rightly be increasing visitor numbers and revenue, and increased visitor satisfaction figures.

Historic England

12. We are interested in the views of respondents to the proposed future opportunities and priorities for Historic England. Are these the right priorities and opportunities? Is there anything missing?

We welcome the broad vision for Historic England and the confirmation that it will continue to aspire to be a “confident independent organisation”. The focus for the organisation in statements to date has largely concentrated on its role in heritage protection, particularly in relation to statutory duties relating to the national designated heritage assets. More clarity is needed on its broader role.
We also welcome the statement in section 4.13 that a review of the ‘landscape of heritage services’ is needed. With pressures on local authorities – which have a key role to play with regard to the protection of the historic environment in England through the planning process – we believe that Historic England needs to step back and take a look at structures and mechanisms for the ongoing protection of the whole of the historic environment of England, not just designated assets. This is likely to involve more collaborative working with professional colleagues in local authorities, national amenity societies, professional bodies, and other interested partners, and will require a culture change within Historic England with a new approach based around strong partnerships and facilitation to bring together relevant expertise.

The role of Historic England to enhance professional and public understanding of the historic environment is also crucial. This can be linked with the current key leadership role of English Heritage for information management in relation to the historic environment, and also with its role as an archive for England’s heritage and source of high quality professional advice, eg through the regional science advisors. Within a hard-pressed, modest-sized sector, Historic England has a vital national role in these areas. It is crucial that Historic England retains its expertise and capacity to underpin the work of the wider heritage sector in protecting our historic environment. This is particularly the case in London where the Greater London Archaeological Advisory service provides planning advice to the London boroughs on all archaeology elements of development proposals in the capital and where there is an opportunity for Historic England to demonstrate the public benefits of an exemplary specialist advisory service.

The role of the national Archive and the current work of English Heritage on developing our understanding of the historic environment is significant underplayed within the consultation. These are major assets which should form a key part of the new Historic England. The organisation also has a key role in promoting research, working in partnership with the university sector.

There is no mention within the consultation of the role of Historic England in relation to World Heritage Sites. Currently English Heritage has an important role to play as an advisor to Government, in showcasing best practice within England, and playing a part in the development of international guidelines for managing and conserving key sites and monuments.

13. Are the proposed success criteria to measure the performance of Historic England the right ones? (please tick the appropriate box)

Yes
No **
Don’t know
14. If not what else should be included in the success criteria?

More thought is required to elucidate the success criteria for Historic England once the future role of the organisation is more clearly defined. In acting as a strong independent voice for heritage protection the success should not necessarily be measured by ‘customer satisfaction’ as inevitably there are times when the organisation has to speak out against proposals which will result in damage to the significance of key heritage assets. It cannot do this without an impact on its ‘customer satisfaction’ ratings, depending on which customers are consulted.

The number of NHPP-related action plans going forward may also not be an appropriate measure of success for the organisation given the framework nature and sector-ownership of the next iteration of the NHPP. Discussions within the external NHPP Advisory Board have strongly supported a more collaborative approach to the next iteration of the high level framework which articulates common goals and priorities for the heritage sector, following on from the period covered by the NHPP.

15. Should the National Heritage Protection Plan form the basis of the business plan for Historic England? (please tick the appropriate box)

Yes
** No
Don’t know

16. If no – why not?

The NHPP is now regarded as a framework document which is collectively owned by the historic environment sector (as represented through the NHPP Advisory Board) – although English Heritage currently still has a key role as the progenitor of the current NHPP. The successor document to the NHPP must be genuinely developed by the sector (and others with a role in heritage protection) and its progress should be monitored by the sector.

Both English Heritage (the new charity) and Historic England should develop action plans to deliver elements of the next iteration of the NHPP, when it is agreed by the wider sector.

However, the business plan for Historic England should not solely focus on heritage protection, and therefore the NHPP action plan for the organisation cannot be the same as its business plan.
17. Are there any further points you would like to add in relation to the consultation?

We regret that the consultation has been rushed as this has not allowed time for a full consultation with our members. It has also resulted in a consultation document that has errors and does not provide the level of detail we would have expected to enable us to reach an informed decision on the major changes proposed. In particular, we believe that the full business plan for the new charity should be made publicly available, alongside the conservation plan for the assets in the current care of English Heritage.

We are confused by various mentions of 2026/7 within the document when the consultation is based on arrangements which run to 2022/3 by which time it is suggested that the taxpayer subsidy to support the National Heritage Collection will have ceased.

We feel that consideration should be given to the current English Heritage membership scheme being allowed to cover both organisations in future. It is important that the work of Historic England also has a public audience and a mechanism to demonstrate public support for its work.

Historic England will have a key role as a grant-giving body which sustains parts of the heritage sector and its engagement with public education and outreach, as well as through heritage protection and conservation management. We believe that there is a strong case for this level of grant support to be at least maintained, and ideally increased, and we look to Government to stipulate this in the conditions of its future annual grant settlements with Historic England.

Finally, we suggest that a review is needed of the concept of guardianship. Many of the sites currently held in guardianship are owned and managed by private or other public organisations and the consultation does not consider the potential impact on them and their ability to continue to raise funds to maintain their sites in the longer term. There appears to be a need for further dialogue with these bodies, and a legal review should be undertaken of the definition of guardianship.

We would welcome the opportunity to be closely involved in continuing dialogue with DCMS and English Heritage as the plans for the delivery and funding of the new model are developed.

Yours faithfully

Dr Mike Heyworth MBE
Director