

Submitted by email

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24 May 2020

Re: Historic England Local Authority Strategic Framework

Thank you for the opportunity to submit evidence to this consultation on behalf of the Chartered Institute for Archaeologists (CIfA) and the Council for British Archaeology (CBA). It is pleasing to see Historic England (HE) produce this Local Authority Strategic Framework (LASF) – could fulfil an important strategic purpose and the current draft is an excellent start, which includes some good ideas. Our principle concern in responding to this consultation is to ensure that this document supports local authorities to deliver effective historic environment services and articulates a strategic response to the challenges that they currently face. We also feel that the document lacks aspiration as it fails to adequately link ‘heritage’ and ‘heritage activity’ and public participation to other Local Authority agendas – health, wellbeing, education, placeshaping and growing the wider tourism offer.

We also have an interest in how Historic England delivers advice and support to local authorities, noting in particular the role of the CBA as a statutory national amenity society.

1. Main comments

- 1.1. The draft LASF proactively recognises some of the sector’s concerns around current pressures on local authority historic environment provision (e.g. Priority activities Theme 3: capability and capacity). However, it is not always clear how these challenges are substantially addressed by the strategy, with the greater focus being on the provision of HE’s advice and support to local authorities and existing projects. While these services and projects are important, if local authority historic environment services continue to erode and in places even collapse, there will be no benefit to HE advice. Therefore, to ensure value for money of HE’s investment in advisory services, it will be necessary to ensure that local authorities are able to effectively manage the local historic environment.
- 1.2. We hope therefore that a revised draft could put more emphasis on the strategic approach that Historic England will take to support local authority services to survive and thrive. We are encouraged that the existing document does outline activities and outcomes designed to contribute to this overall aim. However, a clearer overarching objective and a recognition of a broad responsibility to advise, support and champion the historic environment with local authorities would be a huge improvement. We have identified a number of ways to improve how the strategy responds to this objective.
- 1.3. It is also important that strategic vision aims to raise the profile of historic environment and maximise connections with relevant local authority roles and agendas. At present, we feel

that the draft lacks a well-articulated strategic vision in this regard. The document could set out more clearly the wider benefits of 'heritage' and 'heritage activity' and public participation to health, wellbeing, education, placeshaping and growing the wider tourism offer. At present, the document consistently falls back to focus on the management of the historic environment and heritage assets. While we fully support the importance of this, the document and framework could do far more to reach out to local service providers, local museums, archives, schools and education and to local health services, thus demonstrating the wider reach and benefits of heritage activities and the role of HE to facilitate public benefit.

1.4. We consider that the 10-year outcomes (p7) will be important to set some of these broader aspirational aims. However, the existing 10-year outcomes are both narrow, and are only patchily supported through the strategy. Where possible, the LASF should include priority actions and outputs from the beginning of the plan which support these outcomes (in particular objective 7, which is not clearly supported by any proposed priority activities or 3-year objectives).

1.5. On page 2, the 'real world impacts' are much narrower than the 'objectives of the framework'. Whereas the objective to 'build local authority capability and capacity' is very good, and begins to outline an important responsibility, there is no 'impact' which results from this objective. We would suggest an additional 'impact' measure which would be helpful to ensure some accountability for HE on this overarching objective. A possible 'real world impact' would be;

'Local authorities are effectively supported to maintain or strengthen, through effective reorganisation, historic environment services and erosion of provision is reversed.'

1.6. It would be helpful if the LASF more clearly identified how each output (p5) and outcome (p6-7) contributes which objectives to and gave an explanation of the intended impact from each output. A tabulated format would help to join up the separate elements of the framework and identify gaps.

1.7. For example, we support the confirmation of renewed investment in Heritage Champions. However, it is unclear what strategic purpose this investment in Heritage Champions is delivering or whether opportunities are being identified. Heritage Champions could contribute to capability and capacity of local authorities, and help champion heritage's contribution to other agendas, if Champions are enabled to advocate for greater understanding and recognition of the benefits of the historic environment and support historic environment services. More information would therefore be valuable.

1.8. We strongly support the inclusion of both a 3-year and 10-year outcome for achieving a sustainable solution for archaeological archives. However, there is no parallel commitment to ensuring archaeological input into plan-making and development management (i.e. through local authority historic environment advisors). This was, incidentally, a recommendation of the 2016 Culture White Paper. We recommend adding an additional output on page 5 as follows;

o *'A strategy for resilient and effective local authority historic environment services'*

- 1.9. Other 3-year outcomes, which we interpret as supporting theme 3, including the provision of training standards, searchable research frameworks, and audits for HERs are positive inclusions, but we would welcome greater explanation of how these activities respond to recognised problems (for example, sustainability of succession planning for local authority archaeologists).
- 1.10. We would amend objective 7 on page 6 to read;
- o *‘Local authority policies, strategies and planning decisions ensure that heritage is integrated into strategic planning, plan-making, place-shaping and strategic investment decisions’*
- 1.11. Historic England grant aid is an important source of funding to help local authorities ensure capability and capacity. We also know that that funding is already overstretched and is likely to become more so. However, we feel that output 20 is focussed too narrowly to only consider support to local authorities undertaking work on ‘heritage at risk’ (indeed if it means Heritage at Risk – an even narrower sub-set of heritage assets). Instead we believe that HE grant funding should be at least structurally capable of providing grant funding to such things as aiding local authorities to adapt to service pressures and maintain capabilities or improve resilience.
- 1.12. More needs to be made in the document about how HE might facilitate support and input from the wider heritage sector and not just HE to support to LAs. An ambition to facilitate and lead this collaboration would be a valuable addition as a 10-year outcomes.
- 1.13. We recommend inclusion of a clearer and more ambitious strategic vision for Regional Research Frameworks, which need to move beyond HE facilitating them to developing a meaningful delivery and management mechanism. This is another area where HE might not need to take the lead but seek other methods of local co-ordination such as with CBA Regional Groups to help get frameworks together, developing an accessible platform to see regional frameworks, and demonstrate how archaeological investigation can feedback into them as the basis of accessible knowledge sharing. This is referenced in outputs 13, 18 and 22 but without really saying how.
- 1.14. Activity 26 (community engagement) in theme 4 has the aim of aiding communities to have greater input and engagement with the historic environment. It will be important to ensure that this is properly tested to make sure it really does work for this audience. The CBA are on hand to support and/or facilitate this, particularly through our regional groups.
- 1.15. Furthermore, the document should seek to go beyond the compilation of lists and access to the Heritage Gateway. A revamped Heritage Gateway should provide a role of signposting and highlighting advice and information, potentially eventually facilitating true two-way transfer of information. Revising and reimagining this output would be hugely beneficial, potentially linking it to county archives and museums. At present, processes and routes to make enquiries share/deposit information are unclear and complex and efforts to make the public feel more comfortable using these resources is needed. Ensuring that the project has real value for HERs should increase buy in and therefore strategic benefit. At the moment it feels like there’s quite a divide between HERs, the pressure they are under, and their ability

to engage with communities and any resources needed to ensure they are robust enough for people to confidently use them, without creating more work for HER staff.

1.16. More thought and clarity is needed around growing and developing community engagement (such as through better public participation in excavations). This is needed to provide a clearer strategic purpose of activity 26's inclusion of the phrase 'support greater community engagement'. Additional thought could be channelled to help remove the perceived obstacles to community participation, like on site health & safety and private intellectual property concerning excavated finds, only sharing information once they've built a load of houses on top. For instance, there are examples of work (e.g. by Museum of London Archaeology) that could help to inform how public participation and links between developers and community groups could be improved.

1.17. We would also amend activity 16 on page 3 to add 'and develop public participation'.

In conclusion – this is a helpful step forward, but it also needs to do more to recognise and respond strategically to the wider context of provision on effective and sustainable local authority historic environment services and reach out to other partners and delivery mechanisms. It needs to be far more holistic about the heritage offer and benefits to local authorities.

We would be happy to discuss further the issues raised in this consultation. In the meantime, if there is anything more that we can do to assist please do not hesitate to contact us.

Yours faithfully,



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