

Heritage 2020

c/o The Heritage Alliance
Clutha House
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Westminster
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Heritage2020@theheritagealliance.org.uk

23 December 2014

Dear Sir / Madam,

Heritage 2020: strategic priorities for England's historic environment 2015-2020

Thank you for the opportunity to comment on this draft framework.

The Chartered Institute for Archaeologists

The Chartered Institute for Archaeologists (CIfA) is a professional body for the study and care of the historic environment. It promotes best practice in archaeology and provides a self-regulatory quality assurance framework for the sector and those it serves.

CIfA has over 3,150 members and more than 70 registered practices across the United Kingdom. Its members work in all branches of the discipline: heritage management, planning advice, excavation, finds and environmental study, buildings recording, underwater and aerial archaeology, museums, conservation, survey, research and development, teaching and liaison with the community, industry and the commercial and financial sectors.

CIfA was granted a Royal Charter of Incorporation on 03 June 2014.

Heritage 2020

General

CIfA welcomes the formulation of *'shared strategic priorities for organisations working together to maximise the public benefit of the historic environment in England'* (paragraph 1.5 of the draft). In particular, the Institute is heartened to see and strongly supports:

- the firm emphasis upon a shared framework for the sector (rather than an English Heritage plan, as in some quarters its predecessor was, rightly or wrongly, perceived to be)

- the broadening of the framework’s focus beyond protection (important as protection undoubtedly is) and
- the simple, clear and practical way in which the priorities are expressed and explained

Specific concerns and detailed comments are set out below.

This response has been informed by the views of ClfA’s consultation panel and of its Maritime Affairs Group (MAG).

Detailed Comments

Paragraphs 1.4 and 5.2: ‘collections / museums’ and ‘objects’

1. Although the above references appear in the draft, greater emphasis should be put on museums and archiving, both as regards addressing the very real threats in this regard (for instance, in relation to the deposition of excavation archives) and fully utilising the opportunities that they provide (not only for research but also for public engagement).

Paragraph 2.5: Constructive conservation and sustainable management, first bullet point

2. The aim to secure more effective management of the historic environment through the planning system is fully endorsed, given the importance of the planning regime in particular to the management and protection of undesignated heritage assets.

3. However, this reference may be read simply to refer to town and country planning on land, in which case there needs to be some reference to spatial planning at sea through the system of marine licensing under the Marine and Coastal Access Act 2009. This could be done by expanding the reference in this first bullet point or by adding a separate bullet point relating to the marine environment (which would also, for instance, allow reference to be made to the desire to see the United Kingdom Government ratify the 2001 UNESCO Convention on the Protection of Underwater Cultural Heritage¹).

4. Furthermore, care needs to be taken not to concentrate exclusively on planning since the management of heritage assets also takes place through other means (for instance, through rural land management). The encouragement of reuse and growth (although justified in many contexts) needs to be balanced by recognition that in some cases (for example, in relation to many scheduled monuments) reuse is inappropriate and in all cases growth has to be sustainable.

Paragraphs 2.7 and 3.5: Expertise

5. Paragraph 2.7 (in relation to capacity building) states that *‘Practitioners will be cross-disciplinary’* and paragraph 3.5 states that *“experts’ do not have a monopoly on understanding’*. The need for inclusivity and broad-based understanding of issues is accepted. However, such comments need to be balanced with clear recognition of the need for, and importance of, expertise in relation to the historic environment. This is particularly important at a time when, for instance, when some local planning authorities deem it sufficient to rely on planning officers without specific historic environment expertise to provide in-depth assessment of the impact of development upon the historic environment.

6. Notwithstanding the above concern, ClfA is pleased to see and strongly supports the reference in paragraph 6.14 of the draft to initiatives ‘to encourage the specification of accredited professionals’

Paragraph 4.2: Designation

7. The reference to ‘...recognising what is important through formal designation (national and local, statutory and non-statutory)...’, although recognised as only one aspect of conservation, may be read to imply that only those things that are formally designated are important. Reference to the importance (or significance) of undesignated aspects of the historic environment would help to dispel and such impression.

Paragraphs 4.6, 4.7, 5.3 and elsewhere: Marine historic environment

8. Although the historic environment is rightly defined in paragraph 1.2 of the draft to include ‘submerged’ remains, such recognition of issues relating to the marine historic environment is not reflected throughout the document. Thus, for instance, examples of best practice policy and guidance at paragraph 4.6 and of investment in heritage assets at paragraph 4.7 do not embrace the marine historic environment, nor does discussion of public engagement at section 5. The marine historic environment should receive greater prominence in the framework.

Paragraph 4.14: Maximising the use of historic assets

9. Given the breadth of assets involved (including, for example, buried archaeological remains), it would be better to qualify this reference by referring to ‘maximising the sustainable use of historic assets’ [my underlining]. It might also be helpful to use the term ‘heritage assets’ rather than ‘historic assets’ so as to be consistent with planning policy in England and other parts of the draft.

Paragraph 4.15: Preventing and tackling heritage at risk, first bullet point

10. ‘Exploitation’ might be added to the list of causes of loss and damage to heritage assets in the first bullet point. ‘Commercial exploitation’ in the circumstances envisaged in Rule 2 of the Annex to the 2001 UNESCO Convention on the Protection of Underwater Cultural Heritage is said to be ‘*fundamentally incompatible with the protection and proper management of underwater cultural heritage*’ (op. cit.). However, it would be difficult specifically to refer to ‘commercial exploitation’ in this paragraph since, in some contexts, such exploitation might be said not only to be accepted but also to be encouraged. For instance, the letting of a historic building for business purposes might be termed ‘commercial exploitation’, but is often encouraged to secure its future. Simply referring to ‘exploitation’ would allow issues to be addressed where any exploitation causes loss and damage to the asset.

Paragraph 7.7

11. The contrast between ‘Government’ and ‘democratically-elected representatives’ in this paragraph might more diplomatically be phrased as one between ‘Government’ and ‘local, democratically-elected representatives’ [my underlining].

Paragraph 7.8

12. There is a typographical error in the opening words of this paragraph which should presumably read *'The sector should be prepared to look beyond Government in other ways ...'* [my underlining].

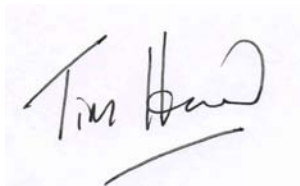
Section 8: Getting Involved

13. One of the strengths of the draft framework is that it offers practical advice in this section on how individual organisations might contribute and help to deliver priorities. It also recognises the need to monitor and review. Nevertheless, there remains a concern that if the priorities are owned by everyone, in reality they are owned by no-one. Consideration may need to be given to the development of mechanisms further to formalise the involvement of stakeholders in the sector.

14. ClfA is committed to the development of the framework and is prepared to contribute to any or all of the working groups as required.

In the meantime, if there is anything further that I can do to assist please do not hesitate to contact me.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Tim Howard', with a horizontal line underneath.

Tim Howard LLB, Dip Prof Arch
Senior Policy Advisor

¹ <http://www.unesco.org/new/en/culture/themes/underwater-cultural-heritage/2001-convention/>