



English Heritage  
1 Waterhouse Square  
138-142 Holborn  
London, EC1N 2ST

[actionplan@english-heritage.org.uk](mailto:actionplan@english-heritage.org.uk)

22 January 2015

Dear Sir / Madam,

### **Consultation on Historic England: Action Plan 2015-2018**

Thank you for the opportunity to comment on this consultation.

#### **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. The Institute was granted a Royal Charter of Incorporation on 03 June 2014.

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.

#### **Draft Historic England: Action Plan 2015-2018**

##### **General**

Historic England will have a central role to play in the future management and protection of the historic environment in England and be a key contributor to *Heritage 2020*, the historic environment sector's plan for its priorities between 2015 and 2018.

Consequently, CIfA welcomes the publication of this Action Plan both as the delivery document for Historic England's Corporate Plan and as a means critically to assess Historic England's input to *Heritage 2020*.

CIfA responded to English Heritage's consultation on Historic England's draft Corporate Plan 2015-2018 by letter dated 12 November 2014.

## Detailed Comments

### ‘Constructive conservation’

1. This term is used throughout the document and it is potentially limiting in its application. It is not clear, for instance, whether this fully embraces all archaeological work undertaken as part of the process of managing change. Whether originally intended to be included or not, archaeological considerations need to be added explicitly to the text where there are references to ‘constructive conservation’ and, if necessary, budgets increased to reflect the need for Historic England to engage more fully with archaeological work.

### ‘Measures of success’

2. It is appreciated that these will be formulated and added subsequently. Nevertheless, the identification and implementation of mechanisms effectively to measure success (or failure) will have an important part to play in achieving the aims and objectives of the Plan. It is hoped that further consultation and discussion with the sector will take place before these mechanisms are finalised.

### Page 4, Corporate Plan Objective 1.1: Make the case for the value of heritage and constructive conservation

3. In its response to consultation on Historic England’s draft Corporate Plan the Institute made the following comment with regard to Objective 1.1:

*‘10. Here and elsewhere in the draft plan [C]IfA would like to see the case expressly made for increased understanding of the historic environment (as a distinct issue and not simply as part of Constructive Conservation)’*

4. With this in mind it would be helpful to refer to ‘knowledge’ in the description of this Objective in order to counter-balance the reference to ‘constructive conservation’.

5. Subject to the above concern, ClfA supports the allocation of significant resources to this Objective.

### Pages 5-6, Corporate Plan Objective 1.3: Use our research, archive collections and education programme to engage and enthuse people about the history of places

6. This is a valuable initiative, but the resource estimate of £2.8 million seems disproportionately high if this only relates to Historic England publications. Historic England should look to support other publications, such as archaeological reports and monographs.

### Page 6, Maintain and develop the national and local Heritage at Risk Registers

7. The opening three sentences under Corporate Plan Objective 1.4 should read:

*‘The Heritage at Risk programme provides a dynamic picture of the health of some of England’s protected heritage. Historic England will maintain and revise the national Heritage at Risk Register annually. The Register does not cover Grade II listed buildings*

*at present, nor does it cover non-designated assets which are 'protected' by other means such as the National Planning Policy Framework.'* [my underlining]

**Page 7, Corporate Plan Objective 5: Support collaboration in the heritage sector through Heritage 2020**

8. This is very much supported by ClfA, but the resource estimate of £0.7 million seems small when compared to other items of internal spend. This risks undermining the collaborative approach that the Plan espouses.

**Page 10, Link to Heritage 2020 Joint Priority Framework:**

- **H2020 Constructive conservation. Ensuring systems of heritage protection are the best that can be devised with the resources available**

9. It is not clear how the activities identified above this item contribute to this H2020 aim.

**Page 10, Corporate Plan Objective 2.2, Resource estimate: £2.3 million**

10. ClfA supports this Objective, but particular care should be taken to ensure that this relatively large allocation of resource delivers real benefits.

**Pages 11-12, Assess significance of our heritage to protect it better**

11. Addressing the backlog of scheduling requests should be added to the topics and a reduction in or removal the scheduling backlog added to the list of outcomes.

**Page 12, Promote Local Lists**

12. ClfA does not oppose this Objective, but is concerned to see that local lists do not preclude the identification of other heritage assets in the planning process.

**Page 12-13, Corporate Plan Objective 2.3: Improve the National Heritage List for England (NHLE) to make it more useful and accessible and enable others to add content.**

13. As a tool for promoting, managing and protecting the historic environment ClfA feels that resources might be better directed to supporting HERs. That is not to detract from this Objective, but is merely recognition of a shortage of funds available fully to pursue every objective.

**Page 13, Develop our research partnerships**

14. The development of strategic research partnerships should not be confined to *'key public and academic sector organisations'*

**Pages 14-15, Corporate Plan Objective 2.6: With our partners, improve access to information through Historic Environment Records and explore ways of moving towards a single means of accessing historic environment information nationally**

15. This Objective is strongly supported by ClfA. However, the resource estimate of £0.8 million is inadequate, particularly by comparison with the resource proposed to be made available in related objectives.

**Page 14, 'Deregulatory trends such as the Regulatory Reform Act 2013 aim to speed up planning processes with the expectations that decision-makers are fully and rapidly armed with the necessary information to make decisions.'**

16. ClfA agrees with the need to improve access to heritage information. However, deregulatory trends (such as the extension of permitted development rights) are in many cases effectively by-passing the decision-making process and, even where decisions have to be made, it is not safe to assume that decision-makers are necessarily *'fully and rapidly armed with the necessary information to make decisions.'* Supporting HERs and the historic environment expertise that underpin them is crucial but there are other issues which have to be addressed.

**Page 16, Corporate Plan Objective 3.1: Help national government, local authorities and local communities create planning policies that support constructive conservation as part of sustainable development.**

17. See paragraph 1 above for ClfA's concerns with regard to the emphasis upon 'constructive conservation'. If local plans are to *'have positive and realistic policies for the local historic environment'* the focus must be wider than 'constructive conservation'.

**Page 17, Corporate Plan Objective 3.3: Advise constructively and consistently on proposals for change at every stage of design and decision-making  
Provide constructive and consistent advice on proposals for change**

18. We would suggest adding 'More effective use of the SMC process to ensure high quality outcomes for public benefit' to the outcomes under this Objective

**Page 18, Provide the Greater London Archaeological Advisory Service (GLAAS)**

19. ClfA welcomes the inclusion of this activity and would suggest adding 'a constantly improving level of HER service' to the desired outcomes.

**Pages 18-19, Corporate Plan Objective 3.4: Target dedicated resources to support Heritage Action Zones in those places where growth offers the biggest opportunities and challenges for heritage**

20. The Objective has significant potential but further information will be required fully to assess that potential.

**Page 19, Corporate Plan Objective 3.5: Invest our expertise and grant aid to unlock solutions for heritage at risk**

21. ClfA is concerned at the high level of spend (£16.5 million) on conservation / repair, particularly when compared with that on strategic actions designed to prevent heritage from

becoming at risk in the first place. A balance has to be struck but greater prominence should be given to prevention (as opposed to cure) in the draft priorities.

**Page 20, Support emergency archaeological investigation in the face of unavoidable loss**

22. This is supported but the outcome should be revised to read *'Where heritage assets of demonstrable national significance cannot be saved, they are investigated and the resultant knowledge is secured and shared with the public in accordance with professional standards'*. [my underlining]

**Page 21, Corporate Plan Objective 4.1: Ensure that Historic England's expertise is accessible, relevant and of a high standard**

23. The reference to 'our guidance' in the last of the outcomes under this Objective should refer to a 'programme of guidance developed with partners'.

**Pages 21-22, Work with others to provide time-limited support for local authorities to develop new ways of delivering their heritage advice and services.**

24. ClfA welcomes this Objective with its emphasis upon collaboration with, and support for, local authorities. Local authority services continue to be under severe threat in their crucial role of providing historic environment services. This Objective warrants a larger allocation of resources given the importance of local authority services in this regard.

**Page 22, Corporate Plan Objective 4.3: Work with others to assess and deliver the heritage skills required by local authorities, owners and others  
Deliver an enhanced and expanded Historic Environment training offer to Local Authorities**

25. ClfA is supportive of the activities identified under this Objective save that:  
(1) the reference to providing training should be one to providing or commissioning training and  
(2) the focus of the training is still to a large extent 'constructive conservation' (albeit that there is also a reference to 'managing change'). See above for ClfA's concerns in this regard.

**Page 23, Implement Historic England's Training Delivery Strategy for owners and their agents / experts in support of *Heritage 2020***

26. ClfA would like to see the outcomes and budget under this Objective revised expressly to include archaeologists and archaeological training.

**Page 24, Ensure heritage science delivers more effective approaches to understanding and protection**

27. With regard to participation in the National Heritage Science Forum it would be helpful if Historic England were able to support the involvement of other bodies unable to pay the high registration fee for the Forum.

**Page 25, Corporate Plan Objective 5.1: Be transparent in our decision-making processes and run an efficient, self-critical organisation that has a constructive approach to risk**

**Strive for greater transparency and efficiency**

28. The resource estimate for this activity is zero, yet if change is to take place there will be costs inherent in that change (for instance, external training, consultation and so on).

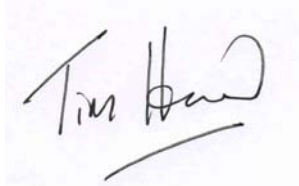
**Corporate Plan Objective 5.3: Increase our resilience by developing non-Government sources of income**

**Increased resilience**

29. Income-generating activities may raise concerns of subsidised competition with the private sector, which will have to be addressed.

ClfA would be happy further to contribute to the development of Historic England's Action Plan. 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