

Heritage Team
DCMS
100 Parliament Street
London
SW1A 2BQ

hlfpolicydirections@culture.gov.uk

26 July 2018

Dear Madam/Sir,

I am writing to you on behalf of the Chartered Institute for Archaeologists (CIfA) and Council for British Archaeology (CBA) in response to the consultation on the revised UK policy directions and the new England policy directions for the Heritage Lottery Fund (HLF).

Our positions are based upon our experience dealing with the HLF as an advisor, collaborator and recipient of funding, and on our relationships with a substantial number of sectoral bodies and projects which have been recipients of HLF funding since its inception. It is also based on our approaches to issues of how to best manage, develop, protect, and resource the nation's heritage, on which we share a similar concern to HLF, underpinned by the drive to deliver services in the public interest. In this regard we, along with the vast majority of the heritage sector has been influenced by the HLF in the past 20 years. This is because it's values and strategy have long sought to develop sectoral conceptions of the purpose of heritage. This has led to the development of new national approaches to managing heritage and cultivating benefits. It has also helped to create a more inclusive, diverse, and representative heritage which is relevant to people's lives and capable of delivering economic, social, cultural, and environmental benefits.

This response is submitted in addition to our online consultation response which limited responses to 200 characters. We feel that is important to fully explain and clarify our concerns in this supporting letter.

About our organisations

CIfA is the leading professional body representing archaeologists working in the UK and overseas. CIfA promotes high professional standards and strong ethics in archaeological practice, to maximise the benefits that archaeologists bring to society, and provides a self-regulatory quality assurance framework for the sector and those it serves.

CIfA has over 3,500 members and more than 80 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.

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

UK-wide questions:

1. Is there anything in these directions that the HLF should not be doing?

Yes.

If yes, tell us what you think HLF should not be doing and why.

- 1.1. Our primary concern is with Direction 1, namely the addition of a specified need to take particular account of ‘any designation’ and ‘heritage at risk’. This is a significant change to the degree of prescription in the Direction, which previously required HLF to take into account the ‘needs of the national heritage’. We think that this Direction is unhelpfully restrictive, promotes a narrowing of the broad scope of HLF’s operation, and fails to recognise the complexity of issues of sustainability and public heritage values.
- 1.2. We stated in our response to the HLF consultation held in March this year that we were not in favour of instating a priority for heritage at risk. We understand that we were in the minority of respondents expressing this view, but would like to reiterate that while we agree that heritage at risk should be a strategic priority for HLF, we believe that careful consideration must be given to the implications of giving priority to this particular issue, as we believe it could have adverse consequences.
- 1.3. We believe that giving an unqualified ‘priority’ to heritage at risk is a mistake for the following reasons:
 - a) It opens a potential to oversimplify processes of assessment of applications for funding and undermine nuanced judgement of a project’s potential to improve the long-term sustainability of heritage assets or deliver benefits to people. It also risks perpetuating a conservation deficit cycle if it harms the HLF’s ability to prevent heritage from becoming ‘at risk’.
 - b) The Direction provides a potential means to side-step challenging but necessary conversations about the fact that it is not possible to ‘save’ every heritage asset.
 - c) The Direction would necessarily put a greater focus on physical conservation of heritage assets to the potential detriment of other types of project which could impact the ability of the HLF to deliver benefits to diversity, wellbeing, and community or intangible heritage.
- 1.4. HLF already takes into account the urgency of need for funding as an aspect of its decision-making. Is this – as was suggested in the previous consultation – a direction which will see heritage at risk ‘prioritised’ over other projects? To what extent and in what way will this be accomplished? These are important questions.

- 1.5. We believe that, to the extent that heritage at risk is a sensible strategic priority, appropriate focus on this issue could be given as part of HLF's regular operational decision-making, and not given an unprecedented locus in the policy direction.
- 1.6. We are also concerned that the direction implies a close link between designation and heritage at risk. As with our comment at 1.4., we perceive this as an unhelpful reversal from the great success that HLF has had since 1994 in pursuing transformative social benefits – which may arise through conservation of heritage at risk, but also from a wide range of other community or public focussed projects.
- 1.7. While it is sensible to give due regard to the level of significance that any asset, site or place possesses, measuring this solely by whether there is a designation is not an adequate way to do this. The fact that much highly valued heritage is undesignated means that there is a greater risk that such heritage will be de-prioritised. Scenarios exist whereby nationally significant archaeological sites remain undesignated (eg due to the discretionary nature of scheduling or falling outside what it is possible to schedule under the 1979 AMAA Act). Furthermore, prioritising designation effectively decreases opportunities to fund projects which are not primarily designed to deliver tangible conservation outcomes, or which deal with undesignated assets. For example, community archaeology, projects which seek to explore heritage stories or histories, intangible heritage, museums, archives, and many other types of project are all currently assessed on an equal basis to projects focussed on tangible heritage at risk.
- 1.8. It is also likely that a focus on nationally designated tangible heritage assets would not find favour in Scotland and Wales, where current national approaches to heritage being developed have a distinct focus diverse heritages and the wellbeing of future generations are being developed.
- 1.9. Fundamentally, achieving an appropriate balance of multiple needs is part of the operational challenge that HLF faces in a context where demand for funding outstrips supply. We believe that HLF has a positive record in doing this since its inception. The revised Direction 1 removes this operational freedom.
- 1.10. We would also like to know whether the HLF's intention would be to link their definition of 'at risk' to Historic England's Heritage at Risk programme. On the one hand, it would make little sense to confuse an established definition by developing an alternate HLF definition, but on the other hand, Historic England's programme is only for designated assets, and as such, is an extreme narrowing of the scope for the assessment of strategic priority for the organisation. The programme also has areas where assets at risk are underrepresented due to lack of local capacity and could see a regional skew to where lottery funding can be distributed.
- 1.11. We recognise the results of the previous HLF consultation which showed that a majority of respondents were in favour of giving priority to heritage at risk. We agree that heritage at risk should be a strategic priority for HLF. However, we advise that care is taken over how to pursue this in a way which does not harm the wider potential of the HLF to contribute to other priority areas; for example, increasing resilience of heritage organisations, enabling community stewardship, increase representation and diversity in

heritage stories and attracting new audiences, and creating more productive and sustainable heritage sites.

- 1.12. To this end we would be much more comfortable with a more nuanced wording for Direction 1. which recognises these issues. For example: "In partnership with other funders and stakeholders, assess the needs of heritage of the UK to inform the awarding of funds, taking into particular account sustainability, heritage value, any designation and heritage at risk."
- 1.13. However, our preference would be to put this complex and nuanced question back into the hands of HLF to deal with through its own operational strategy, and not restrict this through specific prioritisation in UK Policy Directives. We feel that this would be a more appropriate way to – as this consultation sets out - let HLF 'get on with the job' and allow the organisation to respond more effectively to the complex challenge of balancing key strategic priorities in their grant giving.

2. Is there anything that the HLF should be doing that is not covered by these directions?

No.

England directions:

3. Is there anything in these directions that the HLF should not be doing?

No.

4. Is there anything that the HLF should be doing that is not covered by these directions?

No.

Yours sincerely,

Rob Lennox
BSc (Econ) MA PhD ACIfA MCIPR
Policy and Communications Advisor, ClfA