

## **Response to consultation on English Heritage new constitution**

This response is on behalf of the London Forum of Amenity and Civic Societies, a registered charity established in 1988 to support and network over 100 community groups in the capital and to represent their views to the GLA and to Government. The London Forum is a member of the Heritage Alliance, and endorses the comments they have made. This response is supplementary to those comments, and in particular makes some specific London points. This response is made by e-mail rather than shoehorning it into the form provided; it seems more helpful to structure the comments according to the paragraphs of the document.

The Forum does not argue that the split of English Heritage proposed will do great harm, or be unworkable, but wishes rather to draw attention to a number of difficulties and weaknesses which should be addressed before final decisions are taken. We draw particular emphasis to the need to ensure that the special significance of English Heritage in London is recognised as decisions are taken.

Paragraph 2. This paragraph assumes, without any argument, that the 'National Heritage Collection' is all those, and only those, structures that are at present owned by, or in the guardianship of, English Heritage (largely as inheritor of the Ministry of Works). Even accepting that historic buildings etc owned or run by local authorities, the National Trust and private individuals and companies are not part of the National Heritage Collection (and that may need justification, since they are certainly part of the National Heritage) national museums and galleries, and the Historic Royal Palaces surely are, and a rational policy would look at them all together, whether or not it concluded that they should continue to be managed separately.

2.3 The list of services here fails to mention EH's current role in relation to archaeology as sponsor, mentor and occasional financier; and completely ignores its special significance in London, with the Greater London Archaeological Advisory Service (GLAAS). This must be corrected. Historic England, and GLAAS within it, must continue to be consulted on proposals that affect historic assets of any kind in London. and the Greater London Historic Environment Record must be maintained and improved.

2.5 This paragraph assumes, without any argumentation, that those items in the 'National Heritage Collection' which are free to visit should be cross-subsidised by those which can be charged for. If this is justifiable in respect of monuments which do not warrant full-time staffing (and an evidence-based policy would argue this) it cannot be justified for Kenwood. If there are legal or historical reasons why no charge can be made for Kenwood, it should be separated out from the rest and financed permanently from the Exchequer; there is no reason to require those who visit Stonehenge to be levied to keep Kenwood free.

3.5 Third bullet point. Does this mean that the sites which are free because they cannot justify a custodian or because they are inherently open to all will be deprived of the necessary maintenance and interpretation etc. because they will never earn money? They are all part of England's story.

3.8 Does the figure of 5.2 million include visitors to the free sites? This should be made clear.

3.23 Why is all this bureaucratic rigamarole needed when the Charity will continue to be a public body?

3.28 Is the penultimate bullet point an evasive way of saying that after the split there will be more use of historic monuments for purely commercial activities like wedding shows? The London Forum has long been concerned about the use of buildings and spaces under English Heritage's control for corporate events, weddings, product launches etc.; an example is provided by the grounds of Chiswick House, which has been closed too frequently and too long for such purposes.

4. Many people see 'English Heritage' as the power that will prevent or control the demolition or alteration of historic buildings. It will confuse them greatly to be told that English Heritage will no longer do that, but there will be a new body with a new brand name that will. The nomenclature should be rethought.

4.5 Not only businesses - English Heritage affects many individual house owners and not just businesses. Avoid giving the impression that the Government cares more about companies than about people.

4.9 The last sentence is a mealy-mouthed way of saying that Historic England will bend over backwards to let commercial interests do what they want. There have been worrying cases recently when this seems to have been English Heritage's policy (Smithfield to quote but one instance). Historic England should be a robust and uncompromising advocate for the historic buildings of this country. If there are factors which warrant overruling conservation arguments in the interests of the economy or whatever, this should be done by the planning authority as judge, not by the advocate.

4.15 The first bullet point envisages customer surveys. The customer of what is proposed to be Historic England is not the developer or property-owner; it is the community, present and future; surveys must cover them. Though of course owners must be treated fairly.

5.2 See comment on 4 above.

5.9 Gift aid on what? Trading is not usually giftaidable; this needs clarification.

6.2 The assessment of the impact on members should explain how the change will affect the present reciprocal arrangements with Historic Scotland and Cadw.

6.8 This paragraph should cover Historic Royal Palaces.

#### Annex 3

"Constructive conservation". Is it in the interests of the public, whom English Heritage and its predecessors were set up to serve, to see its mission as to work with owners and developers? Why not work with the community?

The sentence "The local teams now focus their resources and expertise on development proposals that have the widest impact on the historic environment and the greatest opportunities for economic growth." implies that a development proposal that has low potential for economic growth ought, by the Government's criteria, be dropped.

May we be assured that certificates of lawfulness of works to listed buildings will not be issued without public consultation; the public may know things about historic buildings which planners do not?

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(for the London Forum of Amenity and Civic Societies)