



ENGLISH HERITAGE

English Heritage response to the DCMS Consultation on the European Commission's Proposal for a Creative Europe Programme

General

1. What benefit has the current Culture/MEDIA/MEDIA Mundus programme brought to your organisation/sector?

English Heritage is a non-departmental public body, established by the National Heritage Act, 1983. It is the UK government's statutory adviser for the cultural heritage sector.

English Heritage has participated in more than 20 EU part-funded culture projects over the years. It has been involved since the very beginning of the programme, from the early RAPHAEL fund through Culture 2000 (covering 2007-14), in some cases as project leader. Many more cultural heritage projects have benefitted the UK in which EH has not specifically been involved. They are notable for their range of subjects and have been highly beneficial particularly in terms of bringing added European value to the cultural heritage sector, in a variety of ways, not least in terms of staff interacting with experts in other EU countries for a range of relevant purposes.

These projects would have been unable to proceed without EU funding.

One caveat we have is the huge amount of administrative input and bureaucracy that is involved, for a relatively small financial input.

Projects in which EH has participated include:

- **“My Place”: Historic Landscape Parks and their Communities**, a European Heritage Laboratory Project concerned with historic parks. Partners included Netherlands, Poland, Germany (former East) and UK. Highlights were public events in parks in UK and Polish/German border, and seminars in each country on maintenance of historic parks.
- **Conservation through Aerial Archaeology**. Partners included Poland, Italy, German Lander, NATO, highlights were aerial photography training for archaeologists (EH Lead).
- **Pathways to European Landscapes**, a three year project. Partners Sweden, Finland, Estonia, Eire, Italy, Czech Republic, Denmark, Germany. Main tasks were landscape characterisation in ten countries with 12 separate projects in all.
- **Working Heritage**. Partners France, Spain, Italy. Highlights included comparative analysis of how the industrial heritage is integrated into urban strategies in historic industrial centres (the UK example being the Birmingham Jewellery Quarter). (EH Lead).
- **ECHO**, concerned with historic houses management. Partners Hungary, Czech Republic, Slovakia, Netherlands. This was a mentoring project concerning management of historic houses.



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- **European Landscapes: past, present and future.** A three year project. Partners Germany, Hungary, Italy with co-partners in Czech Republic, Estonia, Lithuania, Poland, Romania and Slovakia. Main tasks were training schools, mapping and enhancing professional networks across Europe and initiating a European Centre for Aerial Survey and Conservation. (EH Lead).
- **Managing cultural heritage underwater.** A three year project. Partners from Netherlands, Portugal, Finland, Poland, Belgium, Germany. The UK contribution was to undertake projects on designating historic wrecks.
- **Landscapes of War.** Partners Greece, Finland, Italy, Spain. EH contribution was to generate a publicly accessible virtual atlas (digital archive) of England of 20th century war sites.

Previously under RAPHAEL, EH was involved in the following:

- **Europe de l’Air.** Partners France and Germany. This was a listing/survey project of small regional historic airports.
- **Mobility and Exchange of Educators and Training.** Main partner Greece. The project involved training of educators in the field of museum and heritage education and communication.
- **European Heritage Laboratory.** A Hadrian’s Wall project, developing a management plan for conservation of the Roman wall.

2. Is there still a need for EU action in the cultural and creative sectors? If so, why?

Article 167 of the Lisbon Treaty describes how the EU shall contribute to bringing the common cultural heritage to the fore. It specifically says that:

“Action by the Union shall be aimed at encouraging cooperation between Member States and, if necessary, supporting and supplementing their action in the following areas:

- Improvement of the knowledge and dissemination of the cultural and history of the European peoples
- Conservation and safeguarding of cultural heritage of European significance....”

Although some contribution is also made to the historic environment in the structural funds, there is important added value to be gained from projects under what has been known as the Culture Fund because of its trans-national nature. Not least in this respect is the invaluable experience gained by experts in the cultural heritage field working together, exchanging best practice, developing standards and raising awareness of our common European cultural identity.

3. What would be the impact if there were no EU programmes for the cultural and creative sectors?

In terms of the cultural heritage sector it would mean that examples such as those above, of added value would cease. European cultural heritage is not constrained by geographical borders (in the same way as the environment is not confined to one country), and trans-national projects are essential in order to best enhance knowledge and widen public understanding.



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4. Do you agree that the three current programmes should be replaced by a single programme with separate Cross-sectoral, Culture and Media strands? What do you see as the benefits and/or disadvantages of this approach?

This merger is not felt to be particularly advantageous to the cultural heritage sector, as there is a risk of dilution of funds. Whilst the proposed budget of €1.8 bn is said to be 37% higher than the total of Culture 2007 and MEDIA in (together totalling €991.5 million), it is highly likely to be reduced by Council as it has always been in the past. However we do not seek to register opposition to this proposal.

5. Does the proposed programme provide an appropriate framework for the kind of actions which would most benefit your organisation/sector and add value? If not, how should the framework be changed in order to maximise the benefits and added value?

We are concerned that the Culture strand of the proposed programme largely ignores the heritage sector, apart from the prizes and European Heritage Label and some scope for networking. It would be useful to include cultural heritage more explicitly. Currently it appears to favour mainly the performing art and broadcasting sectors.

European added value (Article 3)

6. Does the proposal identify the right means of ensuring added value? Are there any others that should be added?

This appears satisfactory, subject to the comment made in response to Question 5.

Programme objectives (Articles 4-5)

7. Does the proposal identify the right general objectives for the programme? Are there any others that should be added?

The objectives outlined are very narrow. English Heritage would like to see “and cultural heritage” added to objective (a).

8. Does the proposal identify the right specific objectives for the programme? Are there any others that should be added?

Throughout the proposal, the words “cultural” and “creative” are used liberally, but nowhere does it make clear that “cultural” encompasses cultural heritage. We would like to see specific mention of “cultural heritage” added to points (a), (b) and (c), in Article 5, to ensure clarity.

Cross-sectoral strand (Articles 7-8)

9. Do you agree with the proposal for a new financial facility for small and medium-sized enterprises and organisations in the cultural and creative sectors?

This question does not apply to English Heritage.

10. What would be the benefit of such a financial facility to your organisation/sector?

Not applicable.



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11. Would such a financial facility be of greater benefit to some sub-sectors than others? If so, which sub-sectors would be likely to benefit more from the facility and which less, and why?
Not applicable.
12. Is there a risk that such a financial facility could create market distortions? If so, why, and how could the impact on the market be mitigated?
Not applicable.
13. What level/proportion of the financial allocation for the programme should be allocated to such a financial facility?
Not applicable.
14. Do you agree with the proposed support measures for transnational co-operation? Are there any other measures which should be included?
In general these support measures appear uncontroversial, although we would like to see “cultural heritage” specific in (a), (e) and indent 3 of (f).
15. Do you agree with the proposed tasks of the Creative Europe Desks’ network? Are there any other tasks which should be included?
No comment.

Culture strand (Articles 9-10)

16. Does the proposal identify the right priorities for the culture strand? Are there any others that should be added?
These priorities are inadequate, as they appear to be designed for the performing arts sector.
Under point 1, we propose an additional sub-point:
“d) support actions for mutual benefit in the field of cultural heritage, promoting awareness and understanding of European common cultural identity and exchanges of best practice.”
Under point 2, we propose the addition of “cultural heritage” to points (a) and (c).
17. Does the proposal identify the right support measures for the culture strand? Are there any others that should be added?
If the above is included, these support measures would appear to be sufficient, with the caveat that cultural heritage support should not be restricted to the European Heritage Label, the prizes and European Capitals of Culture.

Media strand (Articles 11-12)

18. Does the proposal identify the right priorities for the media strand? Are there any others that should be added?
Not applicable.
19. Does the proposal identify the right support measures for the media strand? Are there any others that should be added?
Not applicable.



Monitoring and evaluation (Article 14)

20. Will the proposed monitoring and evaluation measures be sufficient to measure the overall impact of the programme and the European added value? If not, how could they be improved?

They appear to be adequate.

21. Are the proposed indicators appropriate for monitoring and evaluating the programme? Are they sufficiently SMART (Specific, Measurable, Achievable, Realistic, Time-bound)? Are there any others that should be used?

No comment.

Third countries (Article 16)

22. Is it appropriate to allow access to the programme to non-EU countries on the terms set out in this Article?

It is unclear whether this would entail any dilution of funding. If non-EU countries were to be self-funding this would probably not present problems.

Financial provisions

23. How should the financial allocation for the programme be divided between the strands? Should there be fixed or indicative allocations for each strand and if so what should they be?

Article 19 is unclear. The text appears to be proposing that administrative staff costs at the Commission and the Agency would be covered by this fund, which would be an unusual break from normal practice and deeply cut into the availability of project funding. We hope this is not the intention.

Final comments

24. Do you have any other comments on the Commission's proposal?

English Heritage is concerned that the new fund is designed predominantly for the performing arts and broadcasting sectors, with scant opportunities for the cultural heritage sector. This is disappointing and we hope it can be rectified. The cultural heritage sector is important in terms of fostering a sense of common European identity and for the tourism industry. Projects that can inform and educate the public and those that can lead to higher standards across the sector have real economic value.

It is to be hoped that efforts can be made to reduce the administrative burden both in planning a project and the final accounting. Currently this is disproportionate to the amount of funding available, even for a large organisation because of the huge number of person hours required for administrative tasks.

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