

HISTORIC ENGLAND – HLF STRATEGIC FRAMEWORK CONSULTATION RESPONSE March 2018

Please note that we have numbered the questions for ease of reference.

PART 1: HLF'S ROLE NOW AND IN THE FUTURE

1.1: Do you agree or disagree that HLF's role in the future should be to inspire, lead and resource the UK's heritage to create positive and lasting change for people and communities?

Tend to disagree

1.2: Why do you say that?

HLF is the largest dedicated funder of heritage projects in the UK. As such, it undoubtedly has an important role to play in helping to inspire, lead and resource our heritage. The impact of HLF's funding to date is unquestionable. It has helped to create positive and lasting change to the condition, management and enjoyment of many historic places. But HLF cannot fulfil this role alone, and there will be instances where other sector partners are better placed to take a leading role.

As highlighted in HLF's recent Tailored Review (2017), collaborative working with other organisations across the sector is essential. This includes Historic England as the Government's statutory advisor on the historic environment, and others with the expertise, capacity and strategic outlook to help conserve and champion our heritage. Capitalising on the expertise of other organisations, as appropriate, will ensure the heritage sector is easy to navigate for those who need support or funding. Greater collaboration will also maximise our reach and impact as a sector, including the public benefits that our work is critical to delivering.

We note the proposed shift in HLF's role from helping to make a "lasting difference for heritage and people" to making a "lasting change for people and communities". An appropriate balance needs to be struck between heritage conservation and activities in the allocation of funds. Without the survival of historic buildings, structures, landscapes and places, the important opportunities for community engagement will themselves be undermined.

The conservation of historic buildings and places achieves considerable public benefits in itself - it ensures that heritage can be enjoyed and can contribute to the success of our communities now and in the future; it is a long-term benefit. The importance of conservation work was recognised in the recently published Mendoza review. The review identifies historic museum buildings as part of the collection, and requires Arts Council England, Historic England and HLF to work in partnership to respond to historic museums at risk (recommendation 14). The conservation and repair of our heritage must therefore be a primary consideration in HLF's decision making, together with the viability and quality of a project. Community engagement should remain an important component of HLF-supported projects, but must be a long-term commitment rather than a relatively brief programme of activities.

1.3: Thinking about the different aspects of HLF's role, other than grant-giving, please select and rank up to 5 that you think are most important for HLF to do.

- Building strategic partnerships and collaborations 1
- Attracting other public or private financial support for heritage 5
- Support the capacity and resilience of the heritage sector as a whole 2
- Sharing learning
- Advocating for the value of heritage 4
- Supporting organisations within and beyond the heritage world to come together, collaborate and network
- Inspiring and promoting innovation in business models
- Helping people and communities to meet their aspirations 3

1.4: Why do you say that?

We have ranked the priorities above on the assumption that they are all considered to be secondary or supporting aspects of HLF's role.

HLF's role as a funder and sectoral partner is very significant, but greater collaboration is needed across the heritage sector to maximise our reach and public impact. HLF should capitalise on the expertise, capacity and roles of other organisations. As appropriate, these organisations might be identified as more natural 'leads' than the HLF in some areas – e.g. innovation in business models, and supporting organisations within and beyond the heritage world to come together, collaborate and network.

It should also be noted that some of the ideas in the previous question are givens – for example, building strategic partnerships is a requirement of HLF's recent Tailored Review. Other ideas should be considered end goals in themselves – i.e. helping people and communities to meet their aspirations is the end goal; the question is how the sector can work collaboratively to achieve that objective.

HLF should consider building capacity within smaller organisations which have a role to play in finding positive and sustainable solutions to historic sites/places in greatest need – e.g. the recently funded BRICK programme managed by the Princes Regeneration Trust. Supporting the capacity and resilience of those who care for our heritage is equally important. Investing in governance, skills and business planning at the outset of a project will help to ensure the long-term sustainability of projects funded by HLF.

PART 2: STRATEGIC PRIORITIES FOR HERITAGE AND PEOPLE, + MEASURING OUR IMPACT

2.1: What do you think are the most important heritage needs or opportunities that investment from the National Lottery should address in the UK?

Historic England believes that the most important heritage needs or opportunities that investment from the National Lottery should address are:

- **Heritage valued by communities at greatest risk of loss** –HLF’s resources are far greater than any other funder in the sector – it therefore has a critical role to play in saving our most important (i.e. designated) historic buildings/sites at greatest risk of loss. Conservation work is in itself a public benefit.
- **Place-making** – recent Historic England research shows the importance of heritage to delivering ‘Good Growth’, as well as the potential of heritage-led projects to deliver economic and social dividends. More joined-up thinking to help deliver heritage-led regeneration in places of greatest need is therefore essential.
- **Funding for commercially-focused schemes and privately owned heritage** – building on the success of the Heritage Enterprise scheme, we would encourage HLF to find ways to support more commercially focused schemes (including residential) and privately owned heritage. HLF’s current priorities (particularly the weight given to activities) can sometimes lead applicants towards non-commercial uses for their buildings/places. This can result in long-term business sustainability issues.
- **Supporting poorly resourced groups/organisations** – many projects are run by volunteer groups who care for their heritage at their own expense and in their own time. They are simply ensuring that heritage is not ‘lost on their watch’. There is a danger that the current application process favours organisations that are either well-resourced to make applications and/or already deliver community activities as part of their core business. This can make it more difficult for nascent community organisations with limited public engagement experience to compete for funding. Resilient Heritage funding could be a means to help address these capacity issues.

2.2: And what do you think are the most important heritage needs or opportunities that investment from the National Lottery should address in your region or country?

Historic England believes that the most important heritage needs or opportunities that investment from the National Lottery should address are:

- **Heritage valued by communities at greatest risk of loss** –HLF’s resources are far greater than any other funder in the sector – it therefore has a critical role to play in saving our most important (i.e. designated) historic buildings/sites at greatest risk of loss. Conservation work is in itself a public benefit.
- **Place-making** – recent Historic England research shows the importance of heritage to delivering ‘Good Growth’, as well as the potential of heritage-led projects to deliver economic and social dividends. More joined-up thinking to help deliver heritage-led regeneration in places of greatest need is therefore essential.
- **Funding for commercially-focused schemes and privately owned heritage** – building on the success of the Heritage Enterprise scheme, we would encourage HLF

to find ways to support more commercially focused schemes (including residential) and privately owned heritage. HLF's current priorities (particularly the weight given to activities) can sometimes lead applicants towards non-commercial uses for their buildings/places. This can result in long-term business sustainability issues.

- **Supporting poorly resourced groups/organisations** – many projects are run by volunteer groups who care for their heritage at their own expense and in their own time. They are simply ensuring that heritage is not 'lost on their watch'. There is a danger that the current application process favours organisations that are either well-resourced to make applications and/or already deliver community activities as part of their core business. This can make it more difficult for nascent community organisations with limited public engagement experience to compete for funding. Resilient Heritage funding could be a means to help address these capacity issues.

2.3: Should HLF give priority to heritage considered to be 'at risk'?

Yes

2.4: And how would you define heritage that is 'at risk'? Please give as much detail as possible in your answer?

HLF's resources are far greater than any other funder in the sector – it therefore has a critical role to play in saving our most important (i.e. designated) historic buildings/sites at greatest risk of loss.

Historic England's Heritage at Risk programme is perhaps the best recognised and established, but there are others who help to identify heritage at risk of loss. These organisations include the Theatres Trust, SAVE Britain's Heritage and the Greater London Authority's culture team amongst others. We also encourage Local Authorities to prepare and publish their own Heritage at Risk Registers, which should include Grade II (note, these are already covered by Historic England's register in London) and locally listed buildings/sites. Historic England's Heritage at Risk Register is published annually – it is available by region on our website.

Historic buildings/sites identified in any published register (or database), and which have the potential to deliver significant public benefits, should be prioritised. This will of course need to be weighed against the viability and quality of proposals, including their sustainability in the longer-term. HLF should also consider projects that help address vulnerable buildings/sites before their condition becomes sufficiently critical to warrant inclusion in a Heritage at Risk Register.

The priority given to heritage at risk should be embedded within the decision making process. In assessing and prioritising applications, HLF should also consider whether the proposal will address the most urgently needed work. In other words, is the proposal tackling the primary causes of risk? We would also encourage HLF to support projects at an earlier stage – this might involve funding a first phase of urgent repairs to a building/structure at risk, supporting a meanwhile use where several options for a final use/proposal need to be tested, or funding a Conservation Plan at the outset of a project to help guide future projects.

We would welcome the opportunity to discuss how our Heritage at Risk and other specialist teams within Historic England could best work with your local HLF offices. Our advice could

help to effectively prioritise funding, ensure that projects tackle the most urgently needed work, and that all conservation work is of the highest quality. Strong working relationships between local Historic England and HLF staff are critical, as well as uptake of Historic England's expertise (e.g. through HLF's Register of Specialist Services). Indeed, the need for HLF to capitalise on Historic England's specialist expertise was mentioned in HLF's recent Tailored Review (paragraph 3.7, page 30).

2.5: How should HLF take account of different priorities for heritage in England, Northern Ireland, Scotland and Wales within a UK-wide framework?

In the first instance, HLF should have regard to the specific policy directions from Government. It should also seek to collaborate closely with key organisations in each of the four countries to determine specific priorities of need and potential responses.

2.6: Do you agree or disagree that HLF should address under-representation in our funding of geographical areas that have received least funding in the past?

Strongly agree

2.7: Why do you say that?

We would encourage HLF to understand why geographic areas have historically received less funding. I.e. is it a lack of capacity within communities to prepare successful funding applications, is it because an area's heritage is less readily understood or valued, or is it because HLF has no presence or profile within an area?

Funding should be prioritised where there is greatest need. Within these areas, efforts should be made to provide communities and groups with appropriate support - this should not only include advice about how to apply for funding, but advice about how to deliver heritage projects and how to manage them in the long-term. HLF should make effective use of local partners with strong networks and an ability to reach into communities. Resilient Heritage funding could be an effective tool to help build capacity within these areas.

2.8: Do you agree or disagree that HLF should address under-representation in our funding of geographical areas that experience deprivation?

Strongly agree

2.9: Why do you say that?

Recent [research](#) published by Historic England shows a considerable overlap between heritage at risk of loss and areas of greatest deprivation within England (Indices of Multiple Deprivation). For example, 49% of entries on Historic England's London Heritage at Risk Register (2017) are in the most deprived 30% of neighbourhoods, with one in eight in the most deprived 10%. The inference is clear; tackling heritage at risk has the potential to pay a social dividend. Focussing heritage-led regeneration on those sites most at risk is likely to target the communities and places in greatest need. And the impact of HLF's investment in these areas is likely to be greater.

It is essential that HLF provides appropriate support to priority areas. This support will help communities to better understand, care for and celebrate their heritage. HLF should make effective use of local partners with strong networks and an ability to reach into communities.

Funding to build the capacity of organisations or groups able to help deliver HLF's priorities should also be considered – e.g. the BRICK programme administered by the Princes Regeneration Fund, local civic societies or the Architectural Heritage Fund. These third parties play an important role helping to develop skills and build confidence and experience within areas of greatest deprivation.

2.10 Are there groups you think we ought to prioritise in our Strategic Funding Framework?

Other – HLF should prioritise any group that lacks the capacity or confidence to apply for funding to help make better use of heritage to deliver public benefits.

2.11 How could HLF respond to any specific barriers you know these groups face in applying for funding to support their community's heritage?

There is a concern that the preparation of HLF applications has become professionalised, and favours groups that are either well-resourced to make applications and/or already deliver community activities as part of their core business. This can make it more difficult for less experienced groups to compete for funding. Resilient Heritage funding could be a means to help address these capacity issues.

The application process should be open, transparent and jargon-free. It should allow a flexible approach to measuring the public benefits or outcomes of a project. These benefits are not always big or new interventions to a historic building or site – sometimes it's the unspectacular that has the greatest impact. For example, a group of volunteers carrying out cyclical maintenance work, urgent conservation work to a site, or simply opening a building on a regular basis for the public to enjoy. There is a risk that the weight given to activities and community engagement may be restricting the available funding to protect our heritage, and even discouraging potential applicants.

2.12: How could HLF respond to any specific barriers you know these groups face accessing heritage opportunities?

The barriers to accessing heritage opportunities will vary considerably by group and location. HLF should therefore make effective use of the expertise and knowledge of local partners with strong networks and an ability to reach into communities. Funding to build the capacity of organisations or groups able to help deliver HLF's priorities should also be considered.

2.13: How could HLF most effectively support all organisations to reach a wider range of beneficiaries?

Not answered

2.14: How could HLF most effectively support organisations to collect better data on who is benefiting from heritage projects?

HLF should work with partners to develop a simple and standard monitoring framework for projects. This will ensure that grant recipients are not expected to collect different data to satisfy the requirements of each project funder. Heritage projects are often delivered and managed by volunteers, with few resources to collect this data. The requirements for data collection must therefore be proportionate to the project and allow for some flexibility, recognising that not all projects will be able to reach all groups within the local community.

2.15: Do you agree or disagree that HLF should focus on these nine outcomes?

Tend to agree

2.16: Why do you say that?

Historic England is supportive of HLF consolidating the project 'outcomes' it uses to prioritise funding and to measure impact and success (from 14 to 9 outcomes). In particular we support the first outcome, but suggest it is reworded to say "heritage will be in better condition *in the long-term*". The long-term sustainability of heritage projects funded by HLF is critical.

We would also welcome greater focus on social and economic impacts - e.g. well-being, civic pride, jobs, and economic output/GVA. This will create a more nuanced approach to measuring impacts and success, which will work equally for commercially focused schemes. HLF's application and assessment processes should also recognise that different projects will achieve different outcomes.

Historic England has recently commissioned a project looking at public value – the aim is to build a framework so that we can monitor, measure and articulate the public value of the work we do as an organisation. We would be pleased to share the results with HLF in due course.

2.17: Do you have any comments on how people might gain greater well-being through heritage projects?

Heritage can have a positive effect on well-being in many ways – whether encouraging civic pride in local places, supporting new friendships through volunteering or helping people to learn about their history and identity. Simply being able to enjoy the beauty and variety of our heritage also contributes to well-being. HLF should recognise the full breadth of well-being impacts and metrics.

We would encourage HLF to draw on [research](#) commissioned and published by Historic England in 2014 to inform Heritage Counts. This focused on the contribution that heritage makes to well-being by measuring the value of visiting heritage, from historic towns, to public parks, places of worship and archaeological sites. The positive effect on well-being was found to be the same or more than doing other activities, including sports. The monetary value of this positive impact on general well-being was calculated as £1,646 per person per year for the average heritage goer.

PART 3: STRATEGIC INTERVENTIONS AND PARTNERSHIPS

3.1: Do you agree or disagree that HLF should focus on putting heritage at the heart of place-making across the UK?

Strongly agree

3.2: Why do you say that?

Whether a medieval market town, a historic park, or a post-war city centre, every place has a unique and distinctive history that can be harnessed to help achieve a prosperous future. Those with the power to shape the places where we live, work and visit are increasingly recognising that heritage is the key that unlocks success. It creates value and sustains economic vitality, supporting jobs and attracting investment. Heritage provides a canvas for flourishing cultural activity and it helps build connected and healthy communities. It is the vital factor underpinning vibrant and successful places – in other words, putting heritage at the heart of place-making can deliver ‘Good Growth’ (see our recent [publication](#)).

We therefore welcome an approach which puts heritage at the heart of place-making. As the largest dedicated funder of heritage projects, HLF will have an important role in providing appropriate funding to support heritage-led regeneration.

To ensure that future area-based funding is successful, grant schemes across the sector must be complimentary – e.g. Great Places and Heritage Action Zones. Schemes also need to be sufficiently flexible – e.g. allowing for third party grants, funding for private owners, and proportionate requirements for associated activities and project monitoring.

3.3: Who would be the most appropriate partners for HLF and what should their contribution be?

Both Historic England and HLF have a strong tradition of funding area-based regeneration via a succession of grant schemes. Joining up our efforts, together with Arts Council England, to secure the regeneration of places offers opportunities to increase our impact and to secure wider public benefits – e.g. building on Heritage Action Zones and the Great Places scheme. We would welcome an opportunity to help the HLF identify priority places for this area-based funding, drawing on our local knowledge and networks. We can also share our own experiences, helping to identify the ingredients for successful projects, how they can be efficiently administered, and how to ensure proportionate requirements for activities and project monitoring. A more direct relationship between our respective local offices, or even regional and national boards, would be helpful.

There are a number of other organisations engaged in place-making and HLF should take stock of experiences and initiatives elsewhere to inform its own objectives. These organisations include Locality, the Architectural Heritage Fund, Sports England and Power to Change, as well as local organisations (e.g. charitable trusts, civic societies).

Local Authorities will also continue to play an important role. In our experience, place-making is particularly effective where councils lead the market by encouraging private owners to spend money on their own property through grant aid (or potentially loans) to deliver public value. Landscape Partnership schemes were similarly effective in delivering area-based

funding, primarily for our natural heritage (e.g. within Areas of Outstanding Natural Beauty) and drawing on existing networks and partnerships.

Flexible grant programmes will be critical to successful place-making, including third party grant-giving (as with the previous THI and Landscape Partnership schemes). Short-term and meanwhile uses also have an increasing role to play in creating vibrant places.

3.4: Should HLF fund more commercially focused approaches to support projects with a focus on enterprise and skills?

Yes

3.5: Why do you say that?

There are parts of the country where the market is unable to deliver viable solutions to historic buildings and places at risk. Working in partnership with others, HLF should play a proactive role helping to find and fund solutions where there is market failure. Without this intervention there is a risk that communities will be denied access to their heritage and to the successful and vibrant places that heritage is so crucial to delivering.

As such, we would encourage HLF to build on the Heritage Enterprise model to support more commercially focused schemes. This should include residential schemes, which often have the potential to deliver affordable housing in partnership with local authorities or other not-for-profit organisations. Commercial schemes can offer long-term and financially sustainable solutions to entrenched buildings at risk, whilst respecting and working with the historic fabric and character of a place. These schemes can also deliver significant social and economic public benefits, including imaginative approaches to skills and training. And there is public benefit in historic sites simply being conserved so they can be enjoyed and used by the public now and in the future.

Our recent research on historic textile mills in the north illustrates the risk of market failure. In Greater Manchester alone, 45% of historic mills have been destroyed since the 1980s. Yet a YouGov poll shows that 90% of adults believe mills are an important part of England's heritage, story and character. Textile mills are the original Northern Powerhouse; they symbolise the North's industrial heritage but can equally help drive its future. Our research, [*Engines of Prosperity*](#), indicates there are 1,100 textile mills in Greater Manchester and Lancashire, as well as 1,500 remaining textile mills in West Yorkshire. The vacant gross floorspace could accommodate around 52,000 new homes or host 280,000 jobs, whilst allowing for some form of public access. More detailed feasibility studies are needed to help de-risk these projects, funding is needed to carry out urgent structural repairs, and grant-aid is needed to support residential/commercial conversion. HLF could have a significant role to play in helping to fund this work, either through grants or loans with favourable interest rates and flexible terms of repayment.

Finally, we recognise the important role that activities and community engagement play in broadening the reach of a project and helping to sustain it over the longer-term. On occasion, however, we feel this focus can lead applicants towards non-commercial uses for their buildings/places. This can sometimes result in long-term business sustainability problems due to lack of sufficient revenue generation, or as volunteers run out of steam, the

community changes, and groups are unable to attract the skills they need to run a project/business.

3.6: Do you have any suggestions about how HLF can best work with other organisations to support the viable reuse of existing underutilised buildings?

Long-standing buildings/sites at risk often need up-front investment and advice to help 'de-risk' them. This includes early project development work, such as feasibility studies, business planning and costed surveys. Investment in these early stages is essential to a well-formed and successful project.

There are organisations who already offer modest grants to support project development work (e.g. the Architectural Heritage Fund). And there are established Building Preservation Trusts across the UK with the experience to help manage complex heritage projects. HLF should capitalise on the expertise available elsewhere and think about ways it can support and build the capacity of these existing organisations to avoid duplication or inadvertently undermining their valuable work/expertise.

As well as project development work, underutilised historic buildings/sites often need early intervention – e.g. urgent works to ensure that a building is structurally stable or the decontamination of land. In many cases investment is needed before a long-term solution has been developed.

Historic England plays an important role, helping to identify and advise on urgently needed work and, in some cases, providing funding. Through our regional offices we have strong networks and a good understanding of local places, which help us to find imaginative solutions to complex projects where the market has failed to deliver. Our early advice helps to add value and quality, helps to de-risk projects and the knowledge and skills we bring to bear secure better results for heritage and the people who use and enjoy it. We would also encourage HLF to support projects at an earlier stage. This might involve funding a first phase of urgent repairs or supporting a meanwhile use where several options for a final use/proposal need to be tested.

3.7: How can HLF best support heritage organisations across the UK to become more enterprising and financially sustainable?

1. Provide funding to individual organisations to achieve strategic organisational change
2. Provide early stage funding to support new organisations and enterprises in setting their direction
3. Fund business support training and capacity building programmes, including in investment readiness

3.8: Why have you chosen these as your top three?

We are supportive of HLF's commitment to improve the financial resilience of groups delivering and managing heritage projects across the UK. As part of this commitment, HLF should work collaboratively with other organisations to avoid duplication and to avoid inadvertently undermining their expertise and local networks. Successful examples of this collaborative working include the BRICK programme administered by the Princes Regeneration Fund and the Giving to Heritage programme administered by the Heritage

Alliance. The Architectural Heritage Fund also has an important role in building the capacity and resilience of heritage groups and funding viability and feasibility studies.

HLF should consider supporting and/or expanding the ability of these organisations to support the sector through their own networks and programmes.

3.9: What is your organisation's experience of non-grant finance (e.g. loans, equity investments, crowd funding)? Please choose the description that best reflects your current position.

Not answered

3.10: What, if anything, would make your organisation more likely to take up non-grant finance such as loans or equity investment? Please select all that apply.

Not answered

3.11: Why do you say that?

HE welcomes HLF's commitment to test alternative sources of finance, including loans or other types of social investment – this might include 'soft' loans with favourable interest rates, or loans with tailored repayment models to reflect revenue thresholds. These imaginative approaches are essential to help unlock difficult projects, including buildings and sites at risk. A greater range of funding models will provide more options for the private and commercial sectors and will ensure that organisations focus on the long-term sustainability of their project given future repayment requirements. The introduction of loan finance could also help Lottery proceeds go further, with funds recycled on an on-going basis. If loan finance is introduced by HLF, sufficient consideration should be given to ensure any such measures compliment rather than displace existing loan providers (e.g. The Architectural Heritage Fund).

We would also encourage HLF to think imaginatively about the longer-term viability of projects (i.e. post-completion). Indeed, HLF's own research, 'Conservation Outcomes' (2009) identified post-project management and maintenance as an area of concern. One approach could be a sink-fund – in other words, applicants would be required to put a percentage of the overall project cost aside in a separate fund. This would be used to help maintain a project post-completion (e.g. maintenance and other capital costs). It would reinforce the message that maintenance is critical and would help to build resilience into projects from the outset.

In testing these alternative approaches, HLF should take account of the experiences and expertise of other organisations already delivering loans and social investment – e.g. the Architectural Heritage Fund. HLF should avoid duplicating the offer of these organisations.

3.12: What support, if any, would be most useful for your organisation in helping you to access non-grant finance? Please select and rank your top 3.

Not answered

3.13: Why do you say that?

Not answered

3.14: Should HLF provide match funding for organisations who use crowd-funding to win support for their heritage projects?

Yes

3.15: Why do you say that?

Crowd-funding is an inclusive way to draw a wider audience into a heritage project, particularly a younger 'digital' audience. It allows the public (both locally and nationally) to demonstrate their support for a project, helping to achieve 'public ownership'. Groups/organisations would need to develop their communications and digital infrastructure and networks to ensure success. But HLF should only support viable projects that tackle valued heritage at greatest risk of loss.

3.16: How could HLF better support organisations to use digital technology to:

- a) **Create and make available high quality digital content** – see 3.17 and 3.18
- b) **Increase engagement with heritage** – see 3.17 and 3.18
- c) **Diversify audiences for heritage** – see 3.17 and 3.18
- d) **Make heritage more inclusive** – see 3.17 and 3.18
- e) **Increase organisational efficiency and resilience** – see 3.17 and 3.18
- f) **Build the digital literacy of staff, volunteers and trustees/governors** – see 3.17 and 3.18

3.17: How could HLF help organisations ensure that their digital content is accessible to the public now and safeguarded for the future?

HLF projects generate a huge amount of useful information in a digital format, and it is important that this information is publicly accessible. The onus should be on grant applicants to think about the availability and longevity of digital content at the outset of a project. HLF's written guidance should support this.

We would encourage HLF to engage with Historic England's Heritage Information Access Strategy. [HIAS](#) is a programme of interlinked projects designed to simplify and improve public access to heritage data held or generated by Historic England, Local Authority Historic Environment Records and other bodies. Collaborative working across the sector will be essential to ensure appropriate standards for the creation, management, sharing, re-use and storage of digital historic environment data. Other networks include the UK-wide Historic Environment Information Resources Network (HEIRNET), which helps members work together so that their information resources are easier to access for conservation, education, research and general interest. HLF could also make links with the Digital Preservation Coalition.

More specifically, HLF should encourage applicants to think about the accessibility and longevity of digital content as an integral part of their project development – e.g. early consultation with Historic Environment Record (HER) officers and local heritage repositories. Consideration should also be given to how user generated content is managed in the long term and who is responsible for it.

Funding from HLF should take into account the costs and processes (e.g. volunteering initiatives) associated with integrating information into the HER. HLF could also encourage

applicants to lodge their information with the Archaeology Data Service or to share stories by [enriching the National Heritage List for England](#). Publicly available data should include Conservation Plans, surveys and reports, as well as archaeological investigations; the whole breadth of recording carried out during a heritage project. HLF applicants will also need to strike a balance between full and free access to data, and the need to diversify income streams to ensure the long-term viability of projects. For example, it might be appropriate for the public to have free access to digital content up to a certain threshold, above which there would be charge. In other words, the viability of a heritage project should not be jeopardised simply to ensure free access to digital content.

Finally, HLF should consider opportunities to fund repositories for digital content (e.g. the Hestercombe collection of landscape CMPs), as well as funding for third party organisations to develop their training and educational offer in this area. Historic England would welcome the opportunity to discuss this further with HLF.

3.18: How could HLF support innovation in the use of digital technology by organisations that look after heritage and engage the public with it?

We welcome HLF's aspiration to support the innovative use of digital technology and to find ways to engage the public with it. As part of this, HLF should promote and encourage their applicants to engage with other digital resources. As noted previously, this will require collaboration across the sector – this should include engagement with Historic England's Heritage Information Access Strategy (HIAS) and the UK-wide Historic Environment Information Resources Network (HEIRNET) amongst other initiatives.

The public can easily engage, for example, with Historic England's [Enriching the List](#) initiative. Anyone can help to keep the National Heritage List for England rich, relevant and up to date, by sharing images and stories about historic places. Britain from Above was an HLF funded project - users can engage with the website by adding images, memories and suggest locations for unidentified images.

There are also opportunities for HLF to encourage awareness and use of digital recording technologies – e.g. laser scanning, 3D recording and photogrammetry. These technologies need not be costly or overly specialist. HLF could consider funding projects delivered by third parties to help local groups or schools to use these technologies. This would ensure local ownership of the data, which could be used to help with the management of a historic building/site, as well as outreach, communication, presentation and local engagement.

3.19: How could HLF support the heritage sector to engage internationally and deliver benefits for the UK? Please select all that apply?

All three, namely:

- Support for UK heritage organisations to promote themselves internationally.
- Support for knowledge exchange with organisations overseas.
- Work strategically with partners to develop heritage-led inbound tourism.

3.20: Why do you say that?

In the Culture White Paper (March 2016), DCMS tasked Historic England “to work with other heritage organisations to develop the heritage sector’s international commercial offer”. As

the single largest funder of heritage projects in the UK, HLF will undoubtedly have an important role to play in this, but it will need a collaborative approach across the heritage sector.

Historic England has considerable experience supporting the sector to engage internationally. This includes our involvement in the Cultural Protection Fund advisory board, our heritage protection training programme, our technical advice and international collaborations (e.g. the 'Wall to Wall' project – a collaboration between the UK and China to explore how best to protect and manage Hadrian's Wall and the Great Wall of China, both complex archaeological sites and World Heritage Sites). We would welcome the opportunity to share this experience with HLF and to think about opportunities for more collaborative working across the sector.

3.21: Should the HLF involve the public in decision making?

Not answered

3.22: Why do you say that?

Not answered

3.23: What options for involving the public in National Lottery Funding for heritage projects should HLF explore? Please select all that apply.

Not answered

3.24: And what level of grant should we consider this for? Please tick the level of grant for each option.

Not answered

PART 4: OUR PORTFOLIO

4.1: Do you have any comments on our proposal for an open grant programme for all types of heritage project?

There is a wealth of good practice about how to develop, deliver, sustain and measure different types of heritage project – from public parks, to historic high streets and places of worship. This included tailored guidance for applicants under the previous schemes (e.g. Parks for People, Grants for Places of Worship etc.), with case studies and examples of appropriate outcomes to measure the success of a project. It is important that HLF does not lose this learning if it moves to an open grant programme for all types of heritage project.

We would encourage HLF to monitor spend on different types of heritage project, as well as spend by location. This monitoring should be carried out as transparently as possible and the results shared openly. It will help HLF to identify gaps in its reach, ensure proportionate spend across different types of heritage, and help to refine the outcomes against which projects are assessed. To work successfully, an open grants programme will need a flexible approach to project outcomes (the measure of the public benefits a project will deliver). In other words, recognising that the restoration of a public park will have very different outcomes to a project repairing shop fronts along a historic high street, or a project that delivers new affordable homes in an old industrial building. Not all projects will be able to tick all 9 outcomes, and potential applicants and the sector need clarity and confidence about how HLF is applying these outcomes in its decision-making.

We are also concerned that an open grants programme may favour organisations that are better resourced to make applications and/or already deliver community activities as part of their core business. This makes it more difficult for less experienced groups to compete for funding. Under an open grants programme HLF will need to provide less experienced or less well-resourced groups with adequate support and guidance. Resilient Heritage funding could be a means to help address these capacity issues.

Finally, we would encourage HLF to consider allowing applicants to apply for a package of projects. This would give groups/organisations greater certainty and could result in a more visible contribution to place-making.

4.2: Do you agree with the proposal that we increase the ceiling for single-round grants from £100,000 to £250,000?

Yes

4.3: Why do you say that?

Historic England welcomes any simplification and streamlining of HLF's grants, such as the proposed increase in the ceiling for single-round grants. £250k can make a significant and lasting difference to the condition and viability of historic sites, including those at risk.

However, it will be important that projects of this size are shaped by the advice of appropriate specialists, and projects should help to address the most urgently needed work. Projects should not be unnecessarily expanded to fit the available funding, and expenditure

on the fabric of a historic building or site should not be compromised by associated activity costs. A proportionate approach is needed to activities.

Historic England is well placed to provide advice at an early stage to help shape these projects – this could include advice from our Heritage at Risk teams or other technical specialists. We would welcome the opportunity to discuss this with HLF in due course.

4.4: With a lower budget, should HLF set an upper limit on awards?

No

4.5: If you do think HLF should set an upper limit on awards, what should that limit be?

Not answered

4.6: Why do you say that?

Some historic buildings/sites will need significant investment to bring them back into good repair and active use, particularly where the market has failed to deliver a viable solution. In these instances the need for investment is much greater and the potential for public benefits considerable.

As the UK's largest dedicated funder of heritage projects, HLF's programmes should allow for large one-off grants. An artificial upper limit would be unhelpful and could result in historic buildings/sites at greatest risk being lost altogether.

4.7: How should HLF strike a balance of offering larger and smaller awards?

HLF should give equal weight to smaller and larger grants.

4.8: Why do you say that?

HLF should strike a balance between smaller and larger awards. Some projects can achieve considerable public benefits with limited funds (e.g. digitisation of archives, biodiversity recording, or a volunteer led maintenance project). And smaller grants can help to fund important project development work to 'de-risk' a larger project – e.g. the preparation of feasibility studies, condition surveys or Conservation Plans.

However, grants under £10k would rarely address complex issues on larger buildings or sites at risk of loss. Indeed, an open grants programme would mean that all types of heritage project need to be addressed, including area schemes, landscapes or large industrial buildings which require significant investment.

4.9: What needs or opportunities should HLF prioritise for strategic campaigns in the early years of the next Strategic Funding Framework?

HLF should prioritise initiatives that meet some of the objectives and ideas in this consultation document, including greater support for commercially focused schemes and valued heritage at greatest risk of loss.

More specifically, Historic England would encourage HLF to support the following strategic campaigns:

- **Heritage valued by communities at greatest risk of loss** – HLF’s resources are far greater than any other funder in the sector – it therefore has a critical role to play in saving our most important (i.e. designated) historic buildings/sites at greatest risk of loss. Conservation work is in itself a public benefit.
- **Place-making** – those with the power to shape the places where we live, work and visit are increasingly recognising that heritage is the key that unlocks success. It creates value and sustains economic vitality, supporting jobs and attracting investment. Heritage provides a canvas for flourishing cultural activity and it helps build connected and healthy communities. It is the vital factor underpinning vibrant and successful places – in other words, putting heritage at the heart of place-making can deliver ‘Good Growth’ (see our recent [publication](#)). Joining up our efforts, together with Arts Council England, to secure the regeneration of places offers opportunities to increase our impact and to secure wider public benefits – e.g. building on Heritage Action Zones and the Great Places scheme.
- **Engines of prosperity** – our recent research on historic textile mills in the north illustrates the risk of market failure. In Greater Manchester alone, 45% of historic mills have been destroyed since the 1980s. Yet a YouGov poll shows that 90% of adults believe mills are an important part of England’s heritage, story and character. Textile mills are the original Northern Powerhouse; they symbolise the North’s industrial heritage but can equally help drive its future. Our research, *Engines of Prosperity*, indicates there are 1,100 textile mills in Greater Manchester and Lancashire, as well as 1,500 remaining textile mills in West Yorkshire. The vacant gross floorspace could accommodate around 52,000 new homes or host 280,000 jobs, whilst allowing for some form of public access. More detailed feasibility studies are needed to help de-risk these projects, funding is needed to carry out urgent structural repairs, and grant-aid is needed to support residential/commercial conversion. HLF could have a significant role to play in helping to fund this work, either through grants or loans with favourable interest rates and flexible terms of repayment.

4.10: Do you see benefits in HLF offering fixed rate grants for certain types of project through strategic campaigns?

No

4.11: Why do you say that?

We would encourage HLF to allocate funds according to need, rather than applicants tailoring a project around a fixed rate grant.

4.12: We currently require partnership funding (in cash or in kind (e.g. through free use of a venue)) to be contributed by grantees at the following minimum rates. Should we make changes to this approach?

No – retain the current approach

4.13: Why do you say that?

Partnership funding is important and is not just about levering in money – it ensures buy-in on the part of the applicant and gives groups an opportunity to share their story more widely, which is often a catalyst for wider community engagement and longer-term interest in a project.

However, a requirement for more partnership funding could discourage potential applicants, who might feel unable to commit to raising the necessary funds. The timing of funding is also critical to the success of a project – i.e. ensuring that an applicant has sufficient cash flow to manage a large heritage project, which often requires significant up-front investment.

4.14: How should the HLF achieve a balance between offering open funding opportunities and strategic interventions through campaigns, partnership programmes or innovation funds?

HLF should give equal weight to investment in open funding and strategic interventions.

4.15: Why do you say that?

HLF should prioritise viable projects where there is greatest need. This should include funding for valued heritage at greatest risk of loss, funding in areas where the market has failed to deliver, funding for groups with fewer resources or less confidence, and funding in areas of deprivation where heritage-led regeneration has the potential to deliver considerable public benefits.

4.16: Do you agree or disagree that all projects should embed environmental sustainability and that this should be part of our standard criteria for the assessment of applications?

Strongly Agree

4.17: Why do you say that?

We applaud HLF's aspiration to embed environmental sustainability into all projects. In our experience, good practice in sustainability helps to preserve the historic environment. It encourages whole-life considerations such as the retention of original building materials, preservation of the energy already embodied in existing places, the use of low-risk and non-damaging interventions with long lifespans, and good care and maintenance. It encourages the thoughtful assessment of energy requirements and the design of minimal engineering services to achieve maximum effect and minimum damage. And, above all, it leads to heritage assets that are comfortable to use and less expensive to run, ensuring their continued life. This approach to sustainability is illustrated in the Building Performance Triangle, as described in Historic England's *Practical Building Conservation: Building Environment* volume.

HLF must ensure it can respond to environmental sustainability in a nuanced and flexible way through the application and assessment processes. The danger otherwise is that applicants without a sufficient understanding of building performance, or the right professional advice, might be persuaded to adopt a "fabric-first" approach. This can easily result in significant alterations to historic buildings that put the fabric at risk and are expensive to deliver.

HLF will need to ensure that funding at the project development stage is sufficient to cover the necessary background work to understand current environmental performance, and the likely impact of proposed solutions. This might well mean buying in specialist advice to help with environmental assessments and monitoring, and the development of appropriate solutions.

HLF applicants and staff should liaise with Historic England and the Local Planning Authority at the earliest opportunity to ensure meaningful engagement.

4.18: How should HLF ensure applicants follow best practice on environmental sustainability and address the potential negative impacts of climate change?

There is a significant risk that applicants may take an ad-hoc approach to sustainability in response to HLF demands, applying “greenwash” rather than developing a thoughtful and robust project. Environmental sustainability has an important role to play in building resilience into our historic environment, but it is vital that projects do not cause lasting damage to historic significance or fabric.

HLF will need to demonstrate in all its documentation and advice that it expects applicants to consider sustainability in its broadest sense, and that each project will be considered on its own merits. There is no “one-size-fits-all” solution to delivering sustainability. Standard requirements for interventions, for example, would be inappropriate, and could easily end up favouring projects with invasive or inappropriate interventions.

HLF’s good practice guidance, *Reducing Environmental Impacts*, already goes some way towards this end. Similarly, the guideline document *Building Environment and Performance* gives a helpful introduction for applicants. In addition, there is a wealth of advice about environmental sustainability and the historic environment available from the wider sector - HLF should encourage its applicants and their professional advisors to draw on these resources.

As well as the *Building Environment* book, Historic England has many guidance documents available online. Other partners in the sector (such as the SPAB and ChurchCare) offer excellent and easily accessible advice on best practice. HLF and its potential grant applicants might also benefit from the [‘Fit for the Future’](#) network, which is co-ordinated by the National Trust. The network includes more than 500 people from 81 organisations in the not-for-profit sector and beyond, whose members are working together to make their organisation climate-friendly, adaptive and resilient.

We would encourage HLF to think imaginatively about how it could support grant applicants at the earliest stages of project planning and development – in other words, how it could help them to become “intelligent clients” when dealing with issues of sustainability. This might include basic training for groups of applicants. Other options could include peer-to-peer support, project mentoring, webinars, or a telephone helpline.

Historic England would welcome discussions to explore how we might help HLF with this work, and how our own specialist expertise and experience could be shared with HLF staff as well as potential applicants.

PART 5: IMPROVING THE EXPERIENCE FOR CUSTOMERS

5.1: Which of the following resources do you think would be most helpful to applicants preparing proposals and applications? Please rank the top three most helpful.

Application guidance documents and help notes (3)

Video guides to navigating the online application process

'Top tips' short videos from successful grantees

Digital peer to peer support through an online community (2)

Online toolkits and guidance on specialist topics

Webinars on specialist topics

Self-assessment tools/or checklists to identify 'project readiness'

Tailored advice, such as a telephone helpline and/or chat facility (1)

Other, please specify

5.2: Why did you give these rankings?

Tailored advice at the pre-application stage would help groups to develop successful projects – i.e. projects that tackle the most urgently needed work to a building/site and projects that are viable in both the short and long-terms. However, this advice and the interpretation of application guidance must be consistent across all HLF offices.

Historic England staff, including our technical specialists (e.g. architects, structural engineers, quantity surveyors etc.), would be well placed to provide a mentoring or 'hand-holding' service to potential applicants to help scope and deliver particularly complex projects. We would welcome the opportunity to discuss this with HLF. Indeed, the need for HLF to capitalise on Historic England's specialist expertise was mentioned in HLF's recent Tailored Review (paragraph 3.7, page 30).

We would also encourage HLF to work collaboratively with others in the sector to avoid duplicating the support already offered by other organisations. The Heritage Trust Network, for example, has a new online toolkit with step-by-step guidance for groups taking on a heritage project.

5.3: Do you agree or disagree that HLF should introduce an Expression of Interest screening stage for larger grants?

Strongly agree

5.4: Why do you say that?

The preparation of a large HLF application is a considerable undertaking. We would welcome a simple screening stage, which would ensure a reasonable success rate for large

applications and give greater clarity to groups about the requirements for a round 1 application. Applicants often invest significant sums of money before submitting an application to HLF – a screening service might mean that more of this pre-application work could be funded by HLF as part of the development phase.

5.5: In your opinion was the amount of work involved in preparing an application proportionate to the size of grant you applied for?

Not answered

5.6: Why do you say that?

Not answered

5.7: How could HLF simplify its application processes to ensure they are as accessible as possible.

Not answered

5.8: How could HLF use digital technology to improve the customer experience for applicants and grantees?

Not answered

5.9: How could HLF make its processes for managing your grant post-award more efficient?

Not answered