

The future of local government archaeology services:

An Inquiry for the Minister for Culture, Communications and Creative Industries, led by John Howell MP and Lord Redesdale and supported by The Archaeology Forum.

Call for written evidence

In response to issues raised by representatives of the archaeological sector at an event organised by the Archaeology Forum in October 2013, the Minister for Culture, Communications and the Creative Industries, Ed Vaizey, initiated a review to be undertaken by Lord Redesdale and John Howell MP into the future of local government archaeological services.

These services have traditionally played a key role in the identification, protection, conservation and investigation of England's rich archaeological heritage – including sites of undisputed international or national importance. In addition they also provide the backdrop for the nation's long tradition of public involvement with archaeology.

The review wishes to identify sustainable ways of improving or maintaining the provision of these services, recognising that government funding is unlikely to be increased in the short or medium term.

The inquiry wishes to engage the following themes:

- 1) The consideration of options for improving the sustainability of local services providing (i) curatorial advice, and (ii) HERs & archaeological archives, drawing on best practice from local authorities in England and elsewhere in the UK;
- 2) Whether the knowledge and enthusiasm of third sector organisations could be harnessed to help supplement public involvement in archaeology;
- 3) The consideration of (i) how the impending creation of Historic England could provide opportunities to forge closer links between local services and their national counterparts, and (ii) if current sector-produced standards and guidance provide the necessary rigour to underpin such a diversity of provision.

As we move to achieve these goals, evidence would be welcomed on the following eight questions by the deadline of **14th February 2014**:

The existing models for local government archaeology services

1. Do you consider the present system of advice provided from and to local authorities of different types to be working satisfactorily and to acceptable professional standards?
 - a. Do you have evidence of local authorities acting without archaeological advice, or with clearly inadequate provision? Which are they?
 - b. Do you have evidence of local authorities planning or considering acting without archaeological advice, or with clearly inadequate provision? Which are they?
 - c. What trends have you identified?

Please give examples where possible.

2. What are the consequences of inadequate provision of archaeological advice to local authorities? The inquiry is particularly interested in the real or potential
 - loss of archaeological sites without intervention
 - loss of public benefits from participation opportunities, dissemination of the results of archaeological work, archives of the products of that work and interpretation via museums
 - increased uncertainty and cost for developers
 - failure to target advice and grants in rural areas
 - loss of essential archaeological skills

Alternative models for providing planning advice

The inquiry will consider other models for the provision of archaeological advice to local authorities,

3. What other models in England, elsewhere in the UK, or further afield would you like to draw to the inquiry's attention?
 - a. What are their advantages and disadvantages?
4. What role could the proposed Historic England play with local authorities and other partners to create a national framework of heritage protection?
5. How well do/could alternative models cope with the maritime archaeological heritage out to the 12NM limit?
6. Do you believe that sector-produced standards are sufficient to underpin diverse models of service provision? Please elaborate on any suggested improvements

Your recommendation

7. What would be your preferred model for the provision of archaeological advice?
 - a. Is your preference for continuation of the status quo?

- b. If not, which model or models for alternative provision would you recommend, and why?

Broader collaboration

The inquiry is keen to hear how others could contribute to improving or maintaining existing levels of service.

8. In what ways could the knowledge and enthusiasm of third-sector organisations be harnessed to support the work of the present or future mix of public and private organisations in delivering your preferred model of heritage protection?
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HOW TO RESPOND

Please send your response to taf@archaeologists.net by **14 February 2014**.

Please limit your response to roughly 2000 words. You may include web-links to factual supporting data and evidence, and where such evidence is not available on line you may append it.

Local government authority archaeology services:

A briefing paper

Why does archaeology matter?

Everything that is special about England has been touched and shaped by millennia of daily human lives. Archaeology is about uncovering, recording and interpreting that story and is central to our understanding and appreciation of our uniquely rich and diverse past. It helps explain the geography of our towns and cities, the growth of trade and industry, the evolution of our countryside and the development of our political and cultural identity.

Understanding and appreciating this legacy makes a core contribution to local identity. A sense of place and a common cultural perspective are essential ingredients of quality of life for communities and for individual citizens. Archaeology links people in a direct and often exciting way with continuity and change in our society and our surroundings. Like other disciplines in the historic environment, archaeology makes a major contribution to sustainable development and growth, heritage-led regeneration, the tourist economy and wellbeing.

And yet, unlike much of the rest of the historic environment, most archaeological sites have no statutory protection. For many monuments, the biggest potential changes come from development, and their sole means of protection since 1990 has been through spatial planning policy and process. Importantly, this process and the invaluable and vulnerable archaeological resource is not managed by central government or English Heritage but by local planning authorities and their specialist advisors – who are a non-statutory, discretionary resource and who are rapidly disappearing.

What do local authority archaeology services do?

i. Maintain Historic Environment Records (HERs)

The bedrock of any archaeology or historic environment service is the Historic Environment Record (HER), which should be a comprehensive, accessible and authoritative record of the local historic environment. The HER is used to formulate advice to local authorities for informed planning and decision making, to communities engaged in neighbourhood planning, and to inform those who develop, manage, interpret or study the local historic environment. But the HER is not a static record. It needs to be continuously managed and updated to reflect the changing nature of the historic environment as a result of new discoveries, designations, investigations, interpretations and changes in use, management or significance.

- There is a national register of heritage assets from 87 HERs
- 1,500,000 monuments are recorded
- Newly discovered heritage assets are being added at a rate of 2-5% per year
- 75% of HERs are accessible online

ii. Advise on the implementation of national planning guidance to sustain and enhance the significance and setting of local heritage assets

Local authority archaeological advisors advise on strategic development and local plans:

- They appraise land proposed to be allocated for development
- They ensure local plan policies take a sustainable approach to the historic environment, and seek to exploit its contribution to creating growth, jobs and local identity
- They advise and manage the archaeological implications of major infrastructure development and utilities
- They trigger, where necessary, and review, environmental impact assessments

Local authority archaeological advisors advise planning authorities and developers on planning proposals that may affect archaeological sites:

- Local authority archaeological advisors screen all development proposals
- Where necessary they require further archaeological information to enable sustainable planning decisions to be made
- In some case they recommend archaeological conditions on planning permissions
- They advise developers on managing risk, e.g. from potential constraints caused by nationally important undesignated archaeological sites and/or human remains
- They encourage and help developers to create opportunities for community engagement
- They provide advice that can be followed through to appeal if necessary
- In extreme cases they advise planning officers of the need for enforcement

iii. Monitor compliance with planning requirements including conditions on behalf of planning authorities

- Local authority archaeology advisors assess the standard of fieldwork and recording, normally specified to comply with Institute for Archaeologists professional standards
- They monitor the quality of post excavation assessment, publication and archiving – to ensure that the results of work are reported in the right way
- They promote broader public benefit through enhancing understanding and local engagement

iv. Annual outputs

- Local authority archaeology advisors make 15,000 positive planning recommendations annually
- This represents 3% of all planning applications
- Their recommendations result in 5-6,000 archaeological, development-related projects annually, leveraging in over £100 million of developer (mainly private-sector) funding for new public understanding and appreciation of the past
- Where possible they help developers find sustainable solutions that protect, or impact minimally, on those archaeological sites that are significant
- Of all the planning applications, only 100-150 are refused where archaeology is one of the reasons – usually because the development could not be made sustainable or because more information is required

v. Advice on the management of the rural historic environment

It is not only development that may have an adverse impact on important archaeological sites and historic landscapes. The effects of agriculture on sites in the rural landscape can result in severe damage and erosion, even to protected sites. Accordingly local authority advisers

- Provide advice to Natural England and Defra on options for improving the management of archaeological sites, historic buildings and the wider historic landscape through agri-environment schemes

- Through these schemes support environmentally sensitive farming and the income it brings to rural communities

vi. Community outreach and education

Local authorities are focuses of their communities, and local authority archaeology advisers respond to the strong community interest in local heritage by:

- Working with all elements of the community to foster understanding of the historic environment
- Where resources permit, leading community-based projects to explore the local historic environment, and through this contributing to skills development, learning and community cohesion

What it was like before 1990 and comprehensive local authority coverage?

Full coverage of local authority services was achieved in 1989, a year before the publication of modern planning guidance on archaeology in 1990 (PPG 16, replaced by PPS5 in 2010 and NPPF in 2012).

- Before 1989, most archaeological excavation was publicly funded through central or local government: developer-funding was entirely voluntary and almost exclusively restricted to London and a few major developments in the South East of England
- There was also no formalised assessment of the impact of proposed development on archaeological remains, and therefore a high proportion of developments affecting archaeological remains went ahead without any protection or investigation
- There were fewer than 2,000 archaeological projects annually in 1989, compared with between 5000 and 6000 in 2010, even though the number of planning applications was roughly the same at the two dates (500,000)
- Even as late as the mid-1980s, large infrastructure projects such as the M25 and almost all large housing developments had no proper archaeological provision

Precise estimates are difficult to make 25 years on, but it is likely that 100,000 archaeological sites were destroyed without any record between 1950 and 1990 – and the historic environment is that much the poorer for this.

New gaps in the system

In spite of the National Planning Policy Framework's requirement for planning authorities to have access to a HER supported by expert advice, there has been an 18% fall in staffing numbers within local authority archaeology services since 2008 – from 400 to 330 – and they continue to decrease at a steady rate of 3-4% per year. As the economy recovers the construction sector will pick up and planning applications will increase, with a growing demand for archaeological advice. A crisis threatens within the next two to three years. How big will it be, where will it be and when will it happen? We are aware of the following problems;

- planning authorities without access to any archaeological advice
- planning authorities with limited access to archaeological advice, unable to cope with current demand
- services under threat of closure
- services facing severe cuts that will leave them unable to meet future demand

What the consequences may be if we go back to the old days?

Although planning guidance makes good provision for the protection and investigation of archaeological sites, it is of little effect if there are no archaeological advisors to ensure its implementation. Recent experience shows that when local authorities fail to identify the issues and make planning recommendations, the protection afforded to archaeology falls away quickly.

- Planning authorities lack the expert advice to distinguish between legitimate historic environment concerns and nimbyism, with all the attendant risks and costs of challenges and disputes
- Developments that go ahead may be unsustainable in the terms of national planning policy
- Developers are placed at risk of inadvertently having to deal with the conservation of important archaeological remains which have been revealed during the course of construction, when budgets and programmes have been set – delays and unnecessary costs loom, all the more so if human remains or nationally important sites are encountered
- The reputations of planning authorities are damaged
- Government could be challenged on its ability to meet obligations under the Valletta Convention (the *European convention on the protection of the archaeological heritage*)
- Most importantly hundreds, maybe thousands, of archaeological sites are therefore potentially at risk annually as local authorities without archaeologists give planning permission without any provision for investigation or other protection measures

This means that local communities and the nation lose unique assets forever, irreplaceable information about our past, and the opportunities to create developments that reflect the character of a place, enhance its appreciation – and add commercial value to the venture and surrounding businesses.