

I am responding on behalf of the Society of Antiquaries of London to your consultation on Historic England's Local Authority Strategic Framework. The document was considered by our Policy Committee.

1. As a general comment, the ten-year strategic outcomes in the Framework are comprehensive and aspirational. Aspiration is one thing; delivery another. The three-year outcomes seem to us unconvincing as a 'route map' to the ten-year goals, not least because the outputs (p5) lack measureability, other than being time-limited. Perhaps more significantly, the consultation document was drafted before the crisis of Covid-19 struck. The context of the three-year and ten-year outcomes is now a post-Covid world where the constraints and reductions in funding for the historic environment, whether through Historic England or local government, are likely to be even more severe than has been the case over the past ten years. Deregulation will also no doubt be attractive to some politicians. The worst case is that the contents of the document will be quickly out of date and will need to be revisited before the end of 2020/21.

2. Specifically, several of the outputs and outcomes relate, rightly, to problems in the present planning and archaeology regime, in particular the lack of adequate and consistent standards of HERs and the regional research frameworks which should underpin them. Again, the underlying problem is the variability and fragility of the limited resources available to maintain and develop LA HERs. A sustainable solution for the archaeological archives has eluded the sector for decades, largely because the planning and archaeology arrangements have evolved without appropriate responsibility and provision for their funding. The need to address this is flagged by the document in output 5, and projected in outcome 12 in the three-year horizon and outcome 8 in the 10-year scenario; but how will it be funded and achieved? As has been said many times before, statutory underpinning for HERs would also be helpful in reinforcing the function and role of heritage in LAs.

This is a key strategic issue that needs urgently to be addressed in the reform of archaeology and planning generally. Historic England is best placed to lead the sector in promoting and supporting the necessary changes.

3. Ideally, this and other key strategic issues should be pulled out from the (too) long list of outputs, with a clear commitment by Historic England to provide leadership, to take specific actions in partnership with local authorities and to identify the necessary resources. In the same vein, although Section 3 illustrates the wide range of extremely important work that Historic England already undertakes in supporting LAs, it would have been good to present this as a matrix that sets the current activity against the key priorities of the strategic framework (it's not clear what they are), how those priorities will be addressed and how resources will be deployed or redeployed.

4. We also note that the document omits to highlight directly public benefit as a guiding principle of investment in the archaeological archives.

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Chair of Policy Committee  
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