

HIAS HER work package
c/o Ben Wallace
Warwickshire Historic Environment Record
Warwickshire County Council
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RE: CifA response to draft Historic Environment Records in England Guidance

Dear Ben,

Thank you for the opportunity to comment on this draft guidance. This response has been compiled with the input of CifA's Hon. Chair, Jan Wills, who is a member of the HIAS Advisory Board and invited our comments on the draft. CifA strongly welcomes this guidance, which is clear, concise, practical, and adds clarity to the requirements of planning policy in a way which should be useful to both local authorities and users of HER services.

We have a number of comments which relate to the way the document is intended to be used, how it is thus presented, and some comments on the fine wording of various sections, which we set out below:

1. The document needs an introductory paragraph to set out its intentions, scope and authorship. The content of this paragraph will depend on who the document is aimed at, which is not clear from the current draft.
2. If the document is to be used more broadly than with local authorities and service users, then some thought may need to be given to the use and explanation of terminology. There may be some merit in including a glossary.
3. Who will own and badge the final guidance? Will it be solely Historic England, or will it be badged by the project partners? Thought should be given to what manner of presentation would give the greatest weight to the guidance.
4. The final paragraph on page one would benefit from a sentence to describe why an HER can never be complete, as the amount of new information being generated by archaeological research and investigation is not always appreciated, except by those who are directly involved. A similar point could be further emphasised in the final paragraph of the 'Roles and responsibilities Local Planning Authorities' section on p.3. For example, the text could be amended in the following ways (additions highlighted in red):

(p.1) "An HER is a dynamic and constantly evolving resource which requires continuous maintenance and enhancement as new information about the historic environment comes to light. As such, an HER can never be a definitive

record or achieve a state of completeness, **as new information is continually being brought to light**. An HER requires an appropriately qualified and dedicated staffing resource for its upkeep and use by the public.”

(p. 3) “**National** planning practice guidance (PPG) on conserving and enhancing the historic environment notes that “historic environment records are publicly-accessible and dynamic sources of information about the local historic environment. **They are not complete resources of historical information and are constantly being updated, but they provide ...**”

5. Where policy documents are being quoted (e.g. NPPF, PPG), it would be useful to make explicit indication of the significance of the statements quoted, for example on page two, paragraph one of the ‘Roles and responsibilities Local Planning Authorities’ section;

(p.2) “**Government policy, as set out in** the National Planning Policy Framework (NPPF), **states that** local planning authorities should...”

We congratulate the HIAS board for producing this document and look forward to the production of the final version. If we can be of any further assistance, please do not hesitate to contact us.

Yours faithfully,



Peter Hinton BA MIFA FSA FRSA FIAM

Chief Executive, Chartered Institute for Archaeologists

About the Chartered Institute of Archaeology

CIFA is the leading professional body representing archaeologists working in the UK and overseas. CIFA promotes high professional standards and strong ethics in archaeological practice, to maximise the benefits that archaeologists bring to society, and provides a self-regulatory quality assurance framework for the sector and those it serves.

CIFA has over 3,200 members and nearly 80 registered practices across the United Kingdom. Its members work in all branches of the discipline: heritage management, planning advice, excavation, finds and environmental study, buildings recording, underwater and aerial archaeology, museums, conservation, survey, research and development, teaching and liaison with the community, industry and the commercial and financial sectors.