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Dear Sir / Madam,

The future of local government archaeology services: an Inquiry for the Minister for Culture, Communications and Creative Industries

This evidence

Thank you for the opportunity to provide evidence to this inquiry. Written evidence is attached and we would be pleased to provide the inquiry with oral evidence.

IfA

The Institute for Archaeologists (IfA) is a professional body for the study and care of the historic environment. It promotes best practice in archaeology and provides a self-regulatory quality assurance framework for the sector and those it serves.

IfA has over 3,000 members and more than 70 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.

IfA has successfully petitioned for a Royal Charter of Incorporation, and following a Privy Council meeting on 11 February 2014 Her Majesty the Queen signed an Order of Grant.

Yours faithfully,

Peter Hinton BA MIfA FRSA FSA FIAM FSA Scot
Chief Executive

**The future of local government archaeology services:
an Inquiry for the Minister for Culture, Communications and Creative Industries**

Evidence of the Institute for Archaeologists (IfA)

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?*

1.1 In some areas, no.

- The present system of advice from and to local authorities is inextricably linked with the planning system. The impact of development upon heritage assets is a material consideration in the decision whether to grant planning permission. Increasingly, financial pressure has led to the significant reduction or closure of archaeological services with potentially drastic consequences for sustainable development and protection of the historic environment.
- Community engagement, outreach, agri-environment advice, education, and other areas of work are under similar, if not greater threat.

1.2 In the past the lack of an archaeological standard for historic environment services has also produced inconsistency in the application of professional standards. The publication by IfA in 2012 of its *Standard and guidance for archaeological advice by historic environment services*¹ (which is endorsed by ALGAO) remedied that omission. However, the failure of Government actively to encourage or require compliance with that Standard leaves a continuing risk of inconsistency and variable quality.

1.3 Although the Heritage Protection Bill would have created a statutory duty on local planning authorities to have access to a maintained Historic Environment Record (HER), there is currently no such duty. Statutory provisions had been drafted which had cross party support and were not considered a significant additional burden in the impact assessment. The National Planning Policy Framework (NPPF) places requirements on local authorities regarding HERs, but the provisions are not strong enough to prevent some local authorities from dispensing with these services.

1.4. The terrestrial planning jurisdiction of local authorities over archaeological material normally stops at the mean low-water mark. Marine spatial planning arrived in earnest following the Marine and Coastal Access Act 2009 and is consequently less well-developed. Unlike the land-use planning system (where local planning authorities normally make decisions) decisions in the marine zone tend to be made centrally with less input from local authorities. The Marine Management Organisation has recently issued guidance for local authorities (*Marine Planning: A Guide for Local Authority Planners* (2014)²).

a. Do you have evidence of local authorities acting without archaeological advice, or with clearly inadequate provision? Which are they?

1.5 Yes. Examples include Northamptonshire County Council, Merseyside Archaeological Advisory Service, Sandwell Borough Council and Tees Archaeology Service. Further details can be provided and are contained in other evidence (including that of ALGAO and Tees Archaeology).

¹ <http://www.archaeologists.net/sites/default/files/node-files/IfASG-Archaeological-Advice-and-glossary.pdf>

² <http://www.marinemanagement.org.uk/marineplanning/about/documents/localauthorityplanners.pdf>

b. Do you have evidence of local authorities planning or considering acting without archaeological advice, or with clearly inadequate provision? Which are they?

1.6 Local authorities with which the Institute has corresponded in recent years about proposed drastic cuts or closures include Gloucestershire County Council, Gateshead Council, Southampton City Council, Worcestershire County Council, City of Lincoln Council, Sheffield City Council, Sandwell Borough Council, Suffolk County Council, Redcar & Cleveland Borough Council and Middlesbrough Council.

c. What trends have you identified?

1.7 Many authorities have considered large-scale cuts to, or closure of, archaeological services on the mistaken basis that

- they are a 'luxury' (Sandwell Borough Council Equality Impact Statement)
- planning officers can provide the necessary archaeological advice
- HERs are a static resource that, once established, can be left to serve their purpose. Such records play a crucial role in the management and protection of the historic environment, but only if they are continuously maintained and supported by appropriate expert staff.

1.8 Without appropriate archaeological advice

- local authorities grant planning permission without archaeological conditions to safeguard the historic environment, or with inappropriate conditions (for instance, where a requirement for a watching brief is imposed as a perceived 'safety-net')
- pre-determination assessments and reports produced to comply with planning conditions cannot be properly assessed
- heritage / archaeology is not (or is inadequately) scoped in to EIAs.

All these issues were identified when services were drastically reduced in Northamptonshire between 2006 and 2009.

1.9 Public / community engagement and outreach services are being widely cut as a 'soft option'.

2. What are the consequences of inadequate provision of archaeological advice to local authorities?

2.1 Irreplaceable evidence about our past will be lost if we cease effectively to identify, study and conserve the remaining resource.

2.2 There will be wholesale loss of archaeological skills. Local authority archaeology services provide a huge pool of expertise which, once lost, will be hard to recreate.

2.3 There will be missed opportunities for social and economic benefit in terms of sustainable development, regeneration, place-making, community engagement, identity and well-being. The historic environment facilitates sustainable development and gives communities a shared focus.

2.4 The absence of archaeological advice in the planning process will be a deterrent to developers. Uncertainty, and particularly late identification of archaeological assets, affects investment, costs, completion dates and environmental reputation – all significant hazards to economic growth.

2.5 So development may take place but sustainable development may not.

2.6 Inadequate provision will undermine the engagement of communities and the wider localism agenda. The social benefits of archaeology are well-documented (see, for instance, the HLF research review, *Values and Benefits of Heritage* (2012)³). Local authority services provide a crucial link with communities. People are passionate about where they live, but need professional guidance and support effectively to engage in the planning system.

2.7 Investment will be lost. Local authority archaeology services lever in private-sector investment in archaeology. Typically each planning archaeologist post generates c £1million annually of such inward investment – an annual return of 30 to 40 times the cost of employment. This investment brings communities new understanding and enjoyment. It is a major contribution to quality of life and sense of place. Such dividends are rarely equalled by other sectors.

2.8 Local authorities will be unable to offer advice on environmental stewardship and archaeological work undertaken with Heritage Lottery Fund grants.

Alternative models for providing planning advice

3. *What other models in England, elsewhere in the UK, or further afield would you like to draw to the inquiry's attention?*

3.1 The Welsh Archaeological Trusts and the Greater London Archaeology Advisory Service (GLAAS).

a. *What are their advantages and disadvantages?*

3.2 The primary advantage of the above models is the pooling of resources providing a critical mass of expertise. The four Welsh Archaeological Trusts provide a regional archaeological service across the whole of Wales, while GLAAS is part of English Heritage London Local Office, providing archaeological advice for 31 London boroughs and maintaining the Greater London HER. Both models have the relative security of central government funding and therefore not being in direct competition for non-ringfenced resources with other important – but statutory – local authority services.

3.3 With an increased scale, however, comes the need to manage the risk of losing the local connection (with the historic environment, communities and local authority staff, notably planners).

4. *What role could the proposed Historic England play with local authorities and other partners to create a national framework of heritage protection?*

4.1 Historic England should

- issue a clear statement, with DCLG, DCMS and Defra backing, on the responsibilities of local government to obtain suitable archaeological advice

³ <http://www.hlf.org.uk/aboutus/howwework/Documents/ValuesandBenefits2012.pdf>

- repeat English Heritage's 2010 and earlier advice to Government that there should be a statutory requirement for local authorities to have access to a HER service
- identify that the IfA standard provides the basis for measuring the quality of archaeological advice
- obtain funds from Government to support regional or sub-regional initiatives and consortia seeking to reconfigure delivery either through shared services or joint commissioning from third parties
- use those funds to pump-prime new ventures providing that they can satisfy Historic England that they are committed to compliance with professional standards, will be staffed with competent historic environment experts and have appropriate interfaces with other services to the local authorities
- support the early years of such ventures as they attain sustainability, maintaining oversight and using its grant powers to ensure that there is no departure from standards

5. *How well do/could alternative models cope with the maritime archaeological heritage out to the 12NM limit?*

5.1 The remit of new bodies might extend to the 12NM limit, but without adequate resourcing it would be difficult for them to engage fully in marine planning. English Heritage's archaeological advice in the marine zone is presently crucial and is likely to remain so. Historic England must continue to deliver the high level of service required.

5.2 Many of the issues facing maritime archaeologists (such as the regulation of maritime archaeological heritage beyond 12NM) are beyond the remit of this Inquiry.

6. *Do you believe that sector-produced standards are sufficient to underpin diverse models of service provision? Please elaborate on any suggested improvements*

6.1 Yes. IfA Standards and guidance are applicable to any model of service provision. They would be even more effective if specifically endorsed by Government, and if adherence to them were monitored by Government's advisors (see also 7.8).

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?*

7.1 No. Whatever the merits of the current model, lack of resources prevents its efficient operation, requiring the consideration of alternatives.

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

7.2 Regional or sub-regional archaeology services would viably provide advice to those local authorities that are unable adequately or efficiently to resource their own services.

7.3 Local authorities should be encouraged to consider whether stand-alone archaeological services are the best solution, or whether integration with conservation advice would provide greater public benefit. The Institute of Historic Building Conservation is best placed to advise on the severe cuts faces by conservation services and possible solutions.

7.4 Local authorities may also wish to consider integration with natural environment services.

7.5 This could all be achieved through encouragement, pump-priming of transition and monitoring of implementation by Historic England as set out in section 4.

7.6 Continuity of service provision could be better achieved with a statutory duty on local authorities to maintain or have access to a HER supported by expert staff. DCLG is shortly to consult upon additional statutory duties on local planning authorities with regard to plan-making. Paragraph 169 of the NPPF makes clear that in plan-making '*Local planning authorities should either maintain or have access to a historic environment record*' and this requirement should be embedded in any further statutory duty.

7.7 We do not advocate a one-size-fits-all model. Local or supra-local solutions will need to be found locally. This is desirable, but with encouragement from Government for local authorities to find imaginative solutions comes the potential for increasingly varied structures and service providers (public, private, and third sector).

7.8 Consequently, to ensure heritage protection and sustainable development, there will be a yet greater need for Government to prescribe a schedule of activities that a service, however sourced, should be able to provide. That schedule is set out in the IfA Standard and guidance and could be adopted by the Secretary of State in support of a statutory requirement to have access to a service (7.6).

Broader collaboration

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?*

8.1 Locally based third-sector organisations

- contain a wealth of local knowledge and expertise which could support and complement the work of regional archaeological bodies, but would be unable to replace them. They are encouraged to act in accordance with professional standards and the IfA *Code of conduct*.
- have a crucial role to play in identifying shortcomings of local authorities in their stewardship of the historic environment, and in calling them to account.

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2019 words including your questions