**Managing change in the Historic Environment: Research Excavations**

**HES Managing Change Guidance Notes**

**Deadline:** Friday 5 May

**Consultation questions:**

1. **Does this document provide the guidance you would expect?**

 No

Explain:

This document aims to provide clear guidance for how those wishing to undertake research excavations on scheduled monuments should approach project design and applications for Scheduled Monument Consent.

However, the guidance needs more clearly to address its relationship with current policy and strategy for the historic environment, as set out in Scotland’s Our Place in Time Strategy (OPiT), the 2016 HES Policy Statement, and current Scottish Planning Policy (SPP) and whether research excavations in themselves may constitute development and require planning permission. In any event, this guidance should be consistent with planning policy and, in particular, the requirement in paragraph 145 of SPP that *‘Where there is potential for a proposed development to have an adverse effect on a scheduled monument or on the integrity of its setting, permission should only be granted where there are exceptional circumstances’.*

Furthermore, it is notable, however, that there is no reference of Scotland’s Archaeology Strategy, despite the clear resonances between many of the Strategy’s aims and objectives and this topic.

CIfA supports the continued presumption in favour of preservation based on a precautionary principle, and reflecting the overarching aim of sustainability, which is at the heart of Scotland’s historic environment strategy. There needs, in this guidance, to be a clearer exposition of when this presumption might be rebutted.

The principles of sustainability, careful reflection upon research questions, a clear understanding of outcomes in terms of created benefits, and sufficient exploration of other less damaging options are the correct ones within which to set this judgement.

1. **Does the document leave out anything that should be included?**

Yes.

Explain:

We have identified three issues where more information would be useful in this document.

Firstly, notwithstanding the concerns outlined under question 1, excavation can yield knowledge, understanding, and material which enhances the cultural significance of a site, boosting its value, even as the material archaeological values associated with preservation are decreased by the destructive nature of excavation. It can also lead to economic, social, or environmental benefits, such as enhancing commercial potential of a site, or improving access. There is good discussion of demonstrable benefits in a number of places in the document, particularly section 5 (p.7), however, this principle of excavation enhancing significance could be explained more clearly and earlier in the guidance (e.g. page 1, para. 1 and 2) as the premise for assessing the offsetting benefits of research excavations on Scheduled sites. It would be useful for the guidance to reflect upon the aims of Scotland’s Archaeology Strategy, in this regard.

Secondly, whilst it is understood that non-designated sites fall outside the realm of HES’ work, a slightly expanded section detailing the value and principle of excavation on non-designated sites is also worth including, along with the notification of the role of local authorities in the management of these sites.

And thirdly, on page 8, reference to appropriately skilled personnel could be clarified with the mention of professionalism, in addition to skill. We are grateful that CIfA standards are referenced in the ‘useful links’ section, but an in-text acknowledgement that professional accreditation provides the best route to accountability to standards and guidance in the paragraph on page 8 would be a good way to ensure that this is message is effectively communicated.

1. **Does the document include anything you think is unnecessary?**

No.

Explain:

We do not believe that the guidance contains any superfluous information. Some sections appear to be slightly repetitive of guidance within the *Works on Scheduled Monuments* guidance, for example, certain parts of section 5, but these short sections (e.g. description of time periods for SMC applications) are valuable to include for context for the information specific to research excavations.

1. **Do you have alternate examples you would like us to use to help illustrate any of the points made in the document?**

No.

Explain:

CIfA does not have any of its own examples to share. The example of the Strathearn Environs and Royal Forteviot Project is a good illustration of the processes involved, particularly with regard to pre-application discussions, working within research frameworks, and conceptualising broad public benefit outcomes (e.g. training and community engagement). However, a more recent example would be useful to show how OPiT, ScARF, the HES Policy Statement currently affect the process. Alternatively, in text descriptions of how up to date policy or process may differ may suffice.

1. **As we continue to develop our suite of guidance, are there topic areas you would like to see covered?**

No

Explain:

1. **Please provide any additional comments:**