



Chartered  
Institute for  
Archaeologists



Historic England

# The world after PPG16: 21st-century challenges for archaeology

## Appendix 2 Discussion questions and background papers

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## Appendix 2

### Discussion questions and background papers

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## 1. Archaeological archives: new models for archive creation, deposition, storage, access and research

What can the sector do to redefine the archaeological archive and realise its public value?

Online discussion 30th-31<sup>st</sup> March 2017  
Workshop 7<sup>th</sup> April 2017

### Questions for discussion

1. Do we know why we are creating and keeping archives, what their archaeological value is and how they are actually being used? What is their potential for future research, display, public access?
2. Is the existing legal and policy framework sufficient to enable the archaeological archive to be created, deposited and curated?
3. Are there fieldwork and analysis practices we could improve that would refine our approach to selection?
4. Should we keep everything forever, irrespective of the significance of the sites that the archives represent?

Under each of the above themes we considered:

- What are the issues?
- What are the current initiatives for each issue and are they sufficient?
- What needs to be done, by whom and how in an era of reducing public expenditure?
- Do we have the right structures in place to make progress? Who leads?
- Who pays?

### Background paper (Jan Wills, ClfA, 2017)

The successful management of archaeology through the planning process over the last 25 + years, since the introduction of PPG 16 *Archaeology and Planning*, has led to a huge increase in the numbers of archaeological investigations in England carried out each year. These projects range from small evaluations or watching briefs during householder developments, some of which may have identified little or no significant archaeological deposits, to major housing or infrastructure projects generating results of national significance.

Government policy as expressed in the *National Planning Policy Framework* indicates that the archives generated from these investigations should be deposited in the relevant local museum or other public depository; further advice on deposition 'as an integral part of any recording project' is contained in Historic England and sector-supported guidance *Historic Environment Good Practice Advice in Planning Note 2, Managing Significance in Decision-Taking in the Historic Environment*.

However, no holistic provision for archive deposition has ever been planned for or established. Local museums are, therefore, faced with volumes of material that they may have neither the physical capacity to

store nor the specialist staff to curate and, as a consequence, backlogs of archives have built up with the archaeological companies that have carried out the investigations. These difficulties are increasing as cuts to local authority budgets continue, expert curatorial staff are lost and the prospect of investment in additional storage diminishes.

In 2011 the Southport Group report envisaged:

*'a network of resource centres related to existing museum structures and supporting appropriate expertise, that curate archaeology collections (records and material) and provide access to all types of information on the historic environment for a wide variety of users.'*

The recommendations made to support realisation of that vision and progress towards them are summarised in *What about Southport?* (Taryn Nixon 2017), a review undertaken to map progress against the original vision and recommendations of the Southport Group.

Although that vision has not been realised progress has been made on some of the detailed recommendations. Archives issues now have a higher profile within the sector, particularly following the 2012 surveys by the Society for Museum Archaeology and the Federation of Archaeological Managers and Employers. Together these documented the collecting policies of museums, their collecting areas, space constraints and the numbers of specialist curatorial posts (SMA), and identified c 9000 undeposited archives held by archaeological organisations in England (FAME). The statement by FAME in 2016 underlines, however, that the problems documented in 2012 remain.

In 2017 we anticipate the findings of the DCMS Museums Review, although any implementation of its recommendations will take place against a backdrop of intensifying public expenditure restraint. In addition, a number of initiatives are underway that seek to document further the problems or to explore solutions in specific areas:

- An Historic England funded project in five museums to explore the potential for rationalising existing museum archaeology collections.
- Society for Museum Archaeology/Historic England surveys of current museum collecting practice: three annual surveys commencing 2016-17, exploring collection policy, capacity and specialist expertise. The Year 1 report (November 2016) is now available – see below.
- *'Seeing the light of day'* – a project led by the Wiltshire Museum in a partnership with the South West Museum Development Partnership, South West Museums Federation, Historic Environment Teams and the Association of Local Government Archaeological Officers in the South West, Historic England, the Chartered Institute for Archaeology Archives Group, the Society of Museum Archaeologists and the five largest archaeological contractors active in the South West. The aim is to develop business models and guidance on how to deliver funding for archaeological archives from developer contributions, models for sustainable shared storage and public access.

## References

*National Planning Policy Framework*, DCLG 2012, paragraph 141:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/6077/2116950.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf)

*Historic Environment Good Practice Advice in Planning Note 2, Managing Significance in Decision-Taking in the Historic Environment*, Historic England 2015, paragraphs 36 – 40 <https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/>

*Archaeological archives and museums 2012*, Rachel Edwards for the Society of Museum Archaeologists <http://socmusarch.org.uk/socmusarch/gailmark/wordpress/wp-content/uploads/2016/07/Archaeological-archives-and-museums-2012.pdf>

*A survey of archaeological archives held by archaeological practices in England, Scotland and Wales*, FAME 2012: <http://www.famearchaeology.co.uk/download/archaeological-archives/FAME-Report-on-Archaeological-Archives-Final.pdf>

FAME statement on archives, June 2016: <http://www.famearchaeology.co.uk/2016/06/fame-position-statement-on-archaeological-archives>

*Realising the benefits of planning-led investigation in the historic environment: a framework for delivery*, Southport Group 2011, 3.3, 6.3.3, <http://www.archaeologists.net/sites/default/files/SouthportreportA4.pdf>

*What about Southport?* 2017, Taryn Nixon:

[https://www.archaeologists.net/sites/default/files/What%20about%20Southport%20A%20report%20to%20CIfA%20against%20the%20vision%20and%20recommendations%20of%20the%20Southport%20report%202017\\_0.pdf](https://www.archaeologists.net/sites/default/files/What%20about%20Southport%20A%20report%20to%20CIfA%20against%20the%20vision%20and%20recommendations%20of%20the%20Southport%20report%202017_0.pdf)

Review of museums in England, government consultation: <https://www.gov.uk/government/consultations/review-of-museums-in-england>

Museums and Archaeological Archives: Evidence for the DCMS Museums Review from Historic England (circulated to workshop participants).

*Museums Collecting Archaeology (England) Year 1 Report*: November 2016, Historic England/SMA, <http://socmusarch.org.uk/socmusarch/gailmark/wordpress/wp-content/uploads/2016/07/HE-SURVEY-2016-FINAL.pdf>

## 2. Archaeological Standards and Guidance

### What are they for and who sets them?

Online discussion 10-12<sup>th</sup> May 2017

Workshop 17<sup>th</sup> May 2017

#### Questions for discussion

##### 1. A new vision for 2017 and beyond?

**Notwithstanding the changes in planning policy, is the Southport vision is still relevant? Can we construct a new vision for 2017 and beyond?**

**What outcomes do we want to achieve and what should standards therefore contain?**

The 2017 review of Southport concluded that the current framework of standards and guidance is the most robust infrastructure that the archaeological profession has yet had but that there is not yet a consistent commitment to common standards, nor sufficient training to support implementation. The review identified the following issues:

*The main drivers / barriers include:*

- *A disconnect between policy and practice, with organisations not consistently investing in internal communications and training, and individuals not consistently relating their personal work to the underpinning standard.*
- *A reluctance to specify the use of accredited expertise, and assumptions that to do so is anti-competitive or disenfranchises the voluntary and enthusiast sector.*

*Pointers for the next 25 years?*

- *Individual Chartership representing, among other things, a pledge and commitment to quality work based on agreed standards and guidance;*
- *Growing sectoral leadership skills*
- *Managing the tension between demands for more tightly defined process standards than the ClfA outcome-based model, and the need to encourage innovation and creativity.*
- *Responding to the challenges arising from the synthesis of information from developer-funded archaeological work for professional practice in the field and beyond.*

##### 2. Roles and responsibilities – who sets standards?

Many organisations are involved in producing standards and guidance; do we yet have a common understanding about roles and responsibilities or are we all competing with each other? Who should lead on what?

What are the respective roles of Historic England, professional institutes, local authorities and how do they inter-relate?

##### 3. How are standards implemented and enforced?

Formally the only enforcement routes for standards are through:

- the statutory processes: ancient monuments legislation and policy, and the planning process: legislation, policy and government guidance
- the professional institute through accreditation, registration and professional conduct processes
- contractual arrangements where standards are specified

Do we understand regulation and enforcement, and do we have confidence in the way that the profession is regulated? Do we have a 'culture of confident professionalism' that Southport spoke of?

What does it mean to be professional and to whom are we responsible?

#### **4. New thinking on methodology and standards - how do we capitalise on the lessons of synthesis projects, and translate them into professional practice?**

After 25+ years of modern development-led archaeological investigation a number of national synthesis projects have utilised the outputs from this work to re-examine the archaeology of particular periods. The most extensive is probably the Roman Rural Settlement project which has looked at more than 3500 archaeological published and grey literature reports. Apart from a new perspective on the period this has enabled a reflection on methodological issues, including calls for a more *standardised* approach to recording, sampling, artefact retrieval and analysis, and reporting.

#### **5. How much should we be prescribing methods as opposed to seeking outcomes?**

Does the former prevent innovation? How can we raise standards and translate good practice into best practice? How can we raise standards, achieve consistency and yet inspire innovation?

#### **6. Should improving standards make our work more cost-effective or will they add cost?**

**Background paper** (Jan Wills, CIfA, 2017)

#### **The Southport Vision (2011)**

Following the publication of Planning Policy Statement 5 *Planning for the Historic Environment* and *The Government's Statement on the Historic Environment for England* in 2010, the Southport group (convened at the IfA conference at Southport that year) responded with a vision and a set of recommendations for planning-led investigation in the historic environment. The vision was ambitious, sought 'delivery of a range of powerful and imaginative public benefits' and 'planning-led investigation and explanation of the historic environment (that) should be commissioned to comply with clear professional standards for person, process and product'. Under *Quality Management* the specific vision (supported by eight recommendations) was that:

- *Work should be led by accredited experts working to a full range of agreed professional standards for types of work and their products*
- *Professional standards and guidance supplement and replace as appropriate government guidance on the implementation of PPS5 and its successors*
- *Guidance defines and uses consistently the terminology of PPS5*
- *Guidance helps the exercise of professional judgement on what is proportionate and reasonable*
- *There is a greater expectation of and dependence on professional accountability for complying with ethical and technical standards and less reliance on local authority historic environment staff to monitor quality*
- *Expert archaeological practitioners should have the opportunity to apply for Chartered status*



PPS 5 was soon replaced by the *National Planning Policy Framework* (2012) and in the following five years the political, economic and social context has changed considerably. A review of the vision and the recommendations of Southport - *What about Southport?* - and this changed context was undertaken recently for ClfA. The review report forms Appendix 1 of this report.

### **The framework in 2017: codes, standards, guidance, legislation, advice**

#### *Professional standards*

The professional quality framework that applies to all ClfA professionals is provided by the Institute's Code of Conduct, and specific Standards and Guidance on thirteen topics, principally types of archaeological investigation or advice given by organisations within the sector, eg desk-based assessment, excavation, consultancy advice, curatorial advice. The Standard defines the desired outcome; the Guidance seeks to define current good practice, indicating how the Standard and the Institute's Code of Conduct can be adhered to. These documents are enforceable via the professional conduct procedures by which accredited professionals and registered organisations of the institute are held to account. They are not binding on non-accredited practitioners – unless stipulated in a contract - but may still influence their work. They are cited in the *Historic Environment Good Practice Advice in Planning notes* (see below).

#### *Legislation and supporting guidance*

A very high proportion of archaeological investigation in England is generated by the need to assess the significance of, or carry out recording of, heritage assets to be affected by development. Other types of investigation may result from university-led or personal research, works necessary to enable improved management of an archaeological site or structure, or community projects.

Where archaeological investigation in connection with development is concerned overarching government policy is set out in the *National Planning Policy Framework* (2012) replacing, amongst many other documents, the previous specific heritage policy (Planning Policy Statement 5: *Planning for the Historic Environment*, 2010). The subsequent Taylor review (2012) which considered the then '7,000 plus pages of Government Planning Practice guidance'..., and subsequent government policy, has sought to restrict the amount of guidance developed to support the implementation of the NPPF. Accordingly the *National Planning Practice Guidance* (2014) is comparatively brief in its explanation of the policy framework that it supports.

For the small proportion of heritage assets that are scheduled monuments the *Ancient Monuments and Archaeological Areas Act 1979* and the DCMS statement of government policy (2013) towards their management will be the starting point. The latter also covers nationally important but non-scheduled monuments (*cf* paragraph 139 of the NPPF).

#### *Sector-generated guidance*

Following publication of the NPPF and NPPG Historic England, with sector support, produced three *Historic Environment Good Practice Advice in Planning notes* 'to provide more detailed guidance to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the *National Planning Policy Framework* (NPPF) and the related guidance given in the *National Planning Practice Guide* (NPPG)'. While advisory, these documents produced by the government's statutory adviser with sector support are intended to have weight in the planning process.

While the Historic England good practice advice notes were produced with the support of DCLG the production of additional advice is discouraged unless a clear need can be demonstrated. A current example of the latter is DCLG's support for a collaborative revision of the *Mineral Extraction and Archaeology: A Practice Guide (2008)* in preparation by the Minerals and Historic Environment Forum.

Historic England also produces and funds a wide range of technical guidance and advice on, for example, the management of the historic environment; specific types of sites, buildings or landscapes; survey; archaeological science, and other topics not directly linked to any statutory processes.

Other organisations within the heritage sector also produce a large quantity of advice and guidance to assist in the understanding and management of the historic environment. It varies considerably in its purpose, content and format and while much of it is produced by individual organisations, an increasing amount is produced collaboratively.

Local authorities may produce their own guidance aimed at applicants for planning permission for development.

To guide projects undertaken by voluntary groups and researchers in particular the CBA has produced the *Introduction to Standards and Guidance in Archaeological Practice*, with modular content linked to the ClfA standards.

The Heritage Lottery Fund produces guidance for applicants undertaking projects with an archaeological component.

#### *Current initiatives*

The Historic Environment Forum is proposing a mapping exercise of all relevant sector documents, how they fit together hierarchically, where ownership sits, and what weight or status they have, and if/how they are intended to be enforceable; a gap analysis to identify significant gaps in advice produced by the sector; and a strategy for the production of standards and advice by the sector whether by individual organisations or collaboratively.

Historic England is commissioning a 'needs' piece of research to determine the extent to which Historic England's online advice and guidance is getting the right information across to the right people in the most effective and accessible way.

ClfA, in partnership with and funded by Historic England, is convening online discussion and workshops that will inform its future approach to the production of standards and guidance. While Workshop 2 focuses on standards and guidance it is anticipated that others in the series will produce recommendations relevant to (for example) standards in archaeological archiving, techniques and recording in the field, reporting and publication, and the protection and management of heritage assets.

#### **References and source material**

Planning Policy 5: *Planning for the Historic Environment*:

<http://webarchive.nationalarchives.gov.uk/20120919132719/www.communities.gov.uk/documents/planningandbuilding/pdf/1514132.pdf>

*Realising the benefits of planning-led investigation in the historic environment: a framework for delivery*, Southport Group 2011: <http://www.archaeologists.net/sites/default/files/SouthportreportA4.pdf>

*What about Southport? A report to ClfA on progress against the vision and recommendations of the Southport Report (2011)*, Taryn Nixon 2017:

<http://www.archaeologists.net/sites/default/files/What%20about%20Southport%20A%20report%20to%20ClfA%20against%20the%20vision%20and%20recommendations%20of%20the%20Southport%20report%202017.pdf>

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*National Planning Practice Guide 2014*:

<https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>

*Historic Environment Good Practice Advice in Planning Note 2, Managing Significance in Decision-Taking in the Historic Environment*, Historic England 2015: <https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/>

Chartered Institute for Archaeologists Code of Conduct and Standards and Guidance:

<http://www.archaeologists.net/codes/cifa>

*Mineral extraction and archaeology: a practice guide*: <https://content.historicengland.org.uk/images-books/publications/mineral-extraction-and-archaeology/mineral-archaeology.pdf/>

Historic England advice and guidance catalogue:

<https://content.historicengland.org.uk/content/docs/guidance/he-advice-and-guidance-catalogue-apr16.pdf>

Local authority guidance, for example:

[http://www.cheshirearchaeology.org.uk/?page\\_id=148](http://www.cheshirearchaeology.org.uk/?page_id=148)

[http://www.worcestershire.gov.uk/downloads/file/4588/standards\\_and\\_guidelines\\_july\\_2012](http://www.worcestershire.gov.uk/downloads/file/4588/standards_and_guidelines_july_2012)

Council for British Archaeology guidance: <http://www.isgap.org.uk>

Heritage Lottery Fund guidance: <https://www.hlf.org.uk/archaeology-guidance>

Roman Rural Settlement project methodology papers:

<http://www.cotswoldarchaeology.co.uk/developer-funded-roman-archaeology-in-britain/methodology-study/>

### 3. Designation and management of the archaeological resource in the context of a changing planning system

Online discussion 27<sup>th</sup>-28<sup>th</sup> June 2017

Workshop 30<sup>th</sup> June 2017

#### Questions for discussion

1. Is the current system of protection and management of archaeological sites through designation and through the planning system appropriate for the 21<sup>st</sup> century? How might it need to change in response to the challenges of (for example) deregulation in the planning system, Brexit, loss of public sector capacity?
2. Is the proportion of designated to undesignated assets still appropriate, given the changes to the planning system?
3. Do we need new/amended legislation?
4. How do we respond to NPPF paragraph 139 and identify /manage sites of equivalent significance to scheduled monuments?
5. How do we best provide meaningful yet proportionate protection and management for other non-designated heritage assets in accordance with paragraph 135 of the NPPF?
6. How might we need to change our professional practices (eg in strategic planning and development management) in the light of the changes to the planning system?
7. Should we work towards more holistic designation/management eg through merging natural environment, historic environment, landscape designations?
8. A plan for the future: what are our short and long term priorities for change?
  - Are there specific legislative and/or policy changes that we need to lobby for?
  - Are there changes we as a sector can make to the way we do things?
  - Can we learn from recent experience in Wales and Scotland?

## Background papers

### Introduction (Jan Wills, ClfA, 2017)

In England heritage assets with archaeological interest may be protected by designation as (or inclusion within) world heritage sites, scheduled monuments, listed buildings, protected wrecks, registered parks and gardens, battlefields and conservation areas under a range of different legislations. The planning system provides additional policies and consent processes to manage the potential impact of development on these designated assets; for those without designation it is the only means of protecting them from the adverse effects of development. Particularly in the rural environment, where the greatest management challenges may come from activities other than development, many heritage assets have been managed successfully through inclusion within environmental land management agreements during the last 15 + years.

These background papers concentrate on archaeological sites and areas rather than buildings, other structures and places that may have archaeological interest but are protected through non-archaeological designations. The Heritage Protection Reform programme, which culminated in a draft Heritage Protection Bill in 2008, sought to bring together the legislation across the historic environment into a single act but the bill did not proceed through Parliament. As a consequence legislation remains diverse, (with varying terminology and concepts in law and policy including ‘importance’, ‘interest’ and ‘significance’), although planning policy and guidance has now been brought together (see below), and some of the proposals of the 2008 Act have since been enacted as parts of other legislative programmes (e.g. the Enterprise and Regulatory Reform Act 2013).

### *Scheduling (see Flatman 2017 below)*

Scheduling under the Ancient Monuments and Archaeological Areas Act 1979 is discretionary and a powerful, restrictive designation with the ability to control ‘all works’ affecting the scheduled monument through a consent process. The proportion of known archaeological sites that are scheduled is low at c 20,000 monuments (about 2-5 %), distribution being very uneven and ranging from over 1000 to less than 50 monuments per county. In the 1990s the Monuments Protection Programme sought comprehensively to update the schedule and to ensure that all of those sites of national importance were included. Its eventual coverage was incomplete and there has been no recent assessment of the content and coverage of the schedule. The different and non-discretionary legislation covering the built historic environment has led to a much higher proportion of the resource being protected through listing; listing is also used nowadays to protect and manage sites that in the past might have been scheduled, given the greater flexibility of the legislation.

### *The planning system (see eHoward 2017 below)*

Planning Policy Guidance 16 *Archaeology and Planning* in 1990 introduced new government policies facilitating the consideration of archaeology in the preparation of local authority strategic plans and in the development management process. Most of the core elements of the current approach to archaeology and development were introduced at this time: the assessment of the impact of proposed development before or at the planning application stage, a presumption in favour of the preservation of nationally important archaeological remains whether scheduled or not, a model planning condition to facilitate archaeological recording in advance of development, and the transfer of the responsibility for mitigating impact to the developer. This replaced the previous state funding for ‘rescue archaeology’, and voluntary co-operation and

contributions from developers, and had far reaching effects on the structure of the sector as well as the management of archaeology itself. In parallel, Sites and Monuments Records (now Historic Environment Records) and teams of specialist advisers were developed in local authorities, with the support of Historic England's predecessors, to deliver this system.

With changes in emphasis and in terminology this approach was carried through the successors to PPG 16: Planning Policy Statement 5 *Planning for the Historic Environment* in 2010 which brought together archaeology and the built historic environment into a single policy framework for the first time, and the current *National Planning Policy Framework* (NPPF) in 2012.

Despite the generally successful management of archaeology through the planning system there have been long standing concerns about the adequacy of protection (in the context of the small proportion of the resource that is scheduled). A recognition that the undesignated resource also includes many sites of national importance (NI) is reflected in the NPPF paragraph 139 that applies the policies for designated heritage assets to heritage assets with archaeological interest that are of equivalent significance to scheduled monuments. The 2013 DCMS guidance on scheduled monuments and nationally important but non-scheduled monuments also reflects this policy position.

Across 2014 and 2015 English Heritage (now Historic England) commissioned seven pilot projects analysing aspects of national importance on archaeological sites, undertaken by teams from Oxford Archaeology, Solstice Heritage and Wessex Archaeology in partnership with local authority archaeology officers. The results from each project fed into an overarching review of national importance undertaken by HE, and also to a session on this topic at the ClfA annual conference in April 2015. The conference session can be viewed at:

<https://www.youtube.com/playlist?list=PLBjeGwwG0rtSDSNE9y9Qk7RY6J7hdwJLb>

The main documentation for the project is available online at:

<https://www.historicengland.org.uk/listing/what-is-designation/scheduled-monuments/national-importance-programme/>

The ability to evaluate and record in advance of development, and the consequent the huge increase in the number archaeological excavations since 1990, has transformed understanding of the extent of the surviving evidence of past human activity in the landscape. A first wave of synthesis projects to use the post-PPG16 data (such as the Roman Rural Settlement research project and EngLaid) is now demonstrating its value and its potential as a basis for the re-interpretation of our past, as well as a route to informing a more strategic approach to scheduling.

#### *The rural landscape*

In the late 1990s the *Monuments at Risk Survey* provided evidence of the extent of the damage occurring to all archaeological sites, both scheduled and unscheduled from agriculture, especially ploughing, erosion and other processes; the advances in protection from development gained by PPG16 had not been matched in the rural environment. Accordingly the development of environmental management schemes through the Common Agricultural policy allowed the protection and active management of the historic environment to be built into schemes with resultant significant and beneficial impacts in the preservation of rural archaeological sites.

#### *The marine zone*

With the advent of marine spatial planning in UK waters in recent years, development in the marine zone is belatedly edging towards a system comparable to that on land. However, in England reluctance to schedule heritage assets below the mean low water mark, together with Government's failure to embrace the concept of historic marine protected areas in the Marine and Coastal Access Act 2008 has raised question marks as to the effective management and protection of heritage assets at sea.

### ***Changes and challenges***

#### *Legislation*

Immediate prospects for legislative change – whether fundamental (such as revisiting the principles of Heritage Protection Reform) or specific and limited (such as remedying deficiencies in the Ancient Monuments and Archaeological Areas 1979) – seem remote, particularly in the light of the potential legislative demands of Brexit. However, recent experience in Wales provides an example of a successful programme of historic environment legislation and policy revision, and Historic England has been successful in getting elements of reform included in other legislation since the loss of the 2008 Heritage Protection Bill. It is conceivable that opportunities for change will arise during the post-Brexit legislative programme.

#### *The planning system*

Change in the planning system is being driven by a strong deregulation agenda from government. Elements of the system are perceived as barriers to development, especially to the achievement of government house building targets. Changes in legislation include extending permitted development rights, introducing Permission in Principle for sites listed in a 'qualifying document' such as a Local Plan or a Brownfield Register, and restricting the use of pre-commencement conditions, while a review of the NPPF itself is in progress. Although the implications of these actual and proposed changes are not yet fully apparent they may weaken the requirements for information to be provided before the principle of development is agreed, and the mechanisms for securing archaeological investigation in advance of or during development i.e. key elements of the post-PPG 16 system. Government has repeatedly stated that there will be no lessening of protection of the historic environment, and has responded positively to representations; however it is not clear at present how levels of protection will be maintained in the light of the above changes.

#### *Delivery mechanisms*

The delivery of essential information and advice in local authority plan making, development management, and input to land management agreements, relies on specialist archaeology staff: HER Officers, planning advisers and countryside advisers. Severe budget cuts across the whole of local authorities, together with an increase in demand for expenditure on other services, have led to a 33% reduction in numbers of these staff over the last 10 years, leaving some authorities with no specialist staff for periods of time and a general reduction in capacity.

Since 2010 Historic England has experienced an effective cut of c 50% to its resources (both to its core budget and also to its grant-giving budgets), and similar levels of cuts have been experienced by other UK Home Nations' national heritage bodies. This has inevitably placed pressure on staff undertaking designation assessment, post-designation site management, and giving advice on non-designated heritage. Further cuts have to be anticipated in the future.

#### *Brexit*

The impact of Britain leaving the European Union on legislation and policy for the protection and management of the historic environment is unknown but at present areas of concern include the future of Environmental Impact Assessment (especially coupled with the changes in the planning system already underway), and agricultural policy, in particular the fate of agri-environment schemes. Conversely, opportunities may arise to effect beneficial change during legislative programmes.

Acts such as the 1979 and 1990 scheduling and listing legislation are core UK legislation that should be uninfluenced by the UK exit from the EU, although as noted above, indirect impacts may occur in terms of both funding to arms-length organisations like Historic England and also gaining parliamentary time for any revisions to heritage legislation.

#### *Increase in knowledge*

New archaeological sites, including ones of national importance, continue to be identified routinely through the development management process, through ground survey, aerial photography, the use of techniques such as Lidar, and the analysis of existing aerial photographs as part of the National Mapping Programme. Does the sector have the appropriate protection, management and delivery systems in place to respond to this continuing flow of new discoveries?



## The management of nationally important archaeology and Historic England (Joe Flatman, Historic England, 2017)

### Scheduling and archaeology

Historic England takes its statutory responsibilities to recommend sites for scheduling very seriously. Scheduling (through the deployment of the Ancient Monuments and Archaeological Areas Act (1979)) is intended to help ensure that a careful selection of monuments of national importance receive statutory protection and close supervision so that they can be handed on to future generations in as intact a state as is possible. From its beginnings in 1882, the schedule presently includes circa 20,000 entries, ranging in date from before the last ice age to the second half of the Twentieth Century. New entries continue to be included, and existing ones revised, on a regular basis.

Unlike sites listed under the Planning (Listed Buildings and Conservation Areas) Act (1990), the Secretary of State for Culture, as advised by Historic England, exercises discretion to choose the most suitable legal tool for the conservation and future management of monuments on a case-by-case basis. They may choose not to include a monument on the schedule where – notwithstanding a monument’s acknowledged national importance – it is not felt to be in the best interests (including management interests) of the monument to add it to the schedule.

In exercising discretion not to designate nationally important sites as scheduled monuments, the Secretary of State has regard to the fact that some sites can be effectively protected and managed by other forms of statutory heritage designation (including listing and, in the case of certain marine sites, as protected wrecks); through the regulation of potentially harmful activities through the planning system (both terrestrial and marine), the marine licensing regime or other regulatory controls; or by promoting beneficial stewardship by land managers (including through the provision of grant aid). Other monuments enjoy protection by being located in places that have legal protection for other reasons (such as their landscape, biodiversity or geodiversity value), provided that the prevailing management regime is conducive to this.

Scheduling casework, including both strategic and reactive work, remains a core commitment of Historic England. An important element of this is regular discussion with individual Local Authority Historic Environment Services, many of whom submit cases to Historic England for reactive (usually threat-driven) assessment, but who also have a history of proposing strategic, thematic scheduling projects. When Historic England receives applications, these are always dealt with promptly, and a high proportion of scheduling applications received go forward to full assessment. Mechanisms such as identifying the top sites within specific areas that could be assessed for scheduling which Local Authorities are aware of or concerned about, and identifying areas coming under increased development or farming pressure which Historic England might focus work on, are useful to this process, helping to prioritise workloads.

### Recent scheduling casework figures in England

Financial Year	New sites	Amended sites	Total
2011-12	10	6	16
2012-13	51	17	68
2013-14	53	18	71
2014-15	28	57	85

2015-16	40	22	62
2016-17	25	30	55

While numbers of new or amended scheduled sites have been lower over the last few years than was the case in the 1990s and early 2000s (especially under the Monuments Protection Programme), a modest number of newly scheduled sites, and a larger number of amendments of such sites, are added annually to the National Heritage List for England. Historic England is in active discussion with the archaeological sector about the prioritisation of scheduling on the basis of evident significance, threat and research priority, as laid out in Historic England's Corporate Plan. This includes dedicated projects exploring the following topics:

- The use of Historic England's National Mapping Programme to inform thematic and geographical priorities for scheduling;
- The use of large-scale national research projects on archaeology (for example, the recently concluded Rural Settlement of Roman Britain Project) to inform strategic scheduling prioritisation;
- Planning for changes to the DEFRA-led Environmental Stewardship Scheme and the prioritisation of rural sites for possible scheduling as these come out of stewardship protection;
- The development of new approaches to marine heritage data, including the better flagging of sites of National Importance in such data-sets in partnership with Local Planning Authorities and other arms-length public bodies;
- Opportunities for public contributions to National Heritage List for England entries as part of Historic England's 'Enriching the List' Project;
- An on-going project to update the oldest scheduling entries on the National Heritage List for England (the so-called 'Old County Numbers', many of which date back to the early or mid-20th century), in order to help the understanding and thus management of such sites, especially those identified as being a priority within Historic England's Heritage at Risk Programme;

Historic England actively discusses its overarching corporate responsibilities for archaeology with the Historic England Advisory Committee (HEAC) and Expert Advisory Group (EAG). A series of discussion papers were circulated to members of HEAC across 2016 and 2017 that included discussion of many of the issues touched upon in this update.

### **Archaeology in the context of national planning**

The National Planning Policy Framework (March 2012) states that in order to conserve and enhance the historic environment 'non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets'.

Given the desire for as much clarity as possible about significance, there is a need for a better understanding of how such sites are identified, who identifies them, where they are recorded and how such information is accessed. This clarifying role is important for local communities, landowners and developers alike, and is a crucial part of Historic England's core function and legal responsibility to help manage, protect and understand archaeological sites across the country.

During 2014 and 2015, Historic England commissioned seven pilot projects analysing aspects of national

importance on archaeological sites, undertaken by teams from Oxford Archaeology, Solstice Heritage and Wessex Archaeology in partnership with Local Authority archaeology officers. The results from each project fed into an overarching review of National Importance undertaken by Historic England, and also to a session on this topic at the Chartered Institute for Archaeologists annual conference in April 2015. Since that time, Historic England has continued to work on this issue with partners across the sector.

The main documentation for the original National Importance Project is available online, and the draft report's headline conclusions were as follows:

- Heritage assets of national importance can be recognised, assessed and defined. All of the pilot projects advocated a proactive path to identifying such assets;
- There is a desire for such areas to be recorded on HERs combined with GIS and therefore into planning alert mapping, SHINE and Magic, rather than set up as another standalone non-statutory register;
- The project identified Local Authority Historic Environment Services as lacking a standardised protocol to identify and justify non-scheduled nationally important heritage assets against consistent criteria. The production of a protocol which sets out the NI 'Principles of Selection' – and methodology, issues, examples and case studies – would be welcomed;
- There is the need for such a protocol to be agreed between Historic England, government departments (with DCMS in the lead, but other departments such as DCLG involved) and local planning authorities, clarifying how Local Authority Historic Environment Services can seek confirmation of national importance via NPPF paragraph 139 from Historic England within planning-related timescales. The one major concern regarding lack of resources to carry out such work within Local Authority Historic Environment Services was flagged by all pilots.

Since the first phase of the National Importance Project concluded in the summer of 2015, Historic England has been undertaking a series of activities relating to National Importance. This includes the better referencing of National Importance in revisions of Historic England guidance documents, especially the Scheduling Selection Guides, and in the DCMS policy statement on scheduling, which is also currently under review.

Historic England is also in the process of initiating a second phase of the National Importance Project in discussion with government and the sector, which aims to:

- Produce a draft protocol which would set out agreed Principles of Selection – plus methodology, issues, examples and case studies – for National Importance in England, including agreeing how Local Authority Historic Environment Services would seek confirmation of National Importance via NPPF para 139 from Historic England within planning-related timescales;
- Test the draft protocol with a series of different partner LPAs with different historic environment and planning priorities (e.g. urban; suburban; lowland rural; upland rural; coastal; wetland);
- Provide associated training provision on all of the above.

## Changes in the Planning System (Tim Howard, CIfA, 2017)

### Planning and archaeology

1. The planning system is central to the management and protection of the historic environment and provides the only effective protection for many heritage assets with archaeological interest. Much of the archaeological resource is undesignated and its precise nature and extent (and in some cases, even its existence) can be unknown prior to the consideration of development proposals.

2. Archaeology has been recognised as a material consideration in the planning process since the 1970s<sup>1</sup>. Building on the foundation provided by *Hoveringham Gravels*, planning policy has been developed over the years to define

- heritage assets<sup>2</sup> (which are not dependent upon designation)
  - significance<sup>3</sup> and
  - archaeological interest<sup>4</sup>
- and to provide decision-makers with a coherent framework for consideration of the impact of development upon the significance of heritage assets with archaeological interest.

### Planning reform

3. That framework generally remains fit for purpose<sup>5</sup>. However, its effective operation is being undermined by changes in the wider planning system. Planning reform is presented in the guise of ‘streamlining’ and ‘simplification’. Nonetheless, it represents a remorseless programme of de-regulation over the last 10 years fuelled by a perception in Whitehall and town hall that planning and environmental regulation are part of the problem and not part of the solution when meeting the challenge of recession.

4. Much (though not all) of the planning reform agenda focuses on removing the need to make an application for planning permission or lessening the requirements to obtain and implement permission. Broadly, this can be achieved in three ways (given that planning permission is only required for ‘development’ as defined within the Planning Acts), namely

- removing the operation or use from the definition of ‘development’ in the Planning Acts
- altering the Planning Acts so that the operation or use in question, although constituting ‘development’, no longer needs planning permission
- accepting that the development in question requires permission, but removing the need for a specific application (for instance, by providing a general permission through the operation of permitted

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<sup>1</sup> *Hoveringham Gravels v Secretary of State* [1975] Q.B. 754

<sup>2</sup> ‘A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.’ NPPF Glossary

<sup>3</sup> ‘The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic.’ NPPF Glossary

<sup>4</sup> ‘There will be archaeological interest in a heritage asset if it holds, or potentially may hold, evidence of past human activity worthy of expert investigation at some point.’ NPPF Glossary

<sup>5</sup> It must be remembered that the purpose is a planning purpose, i.e. to ensure the appropriate consideration of the historic environment in the regulation of the development of land. It is not intended to, and does not, regulate impacts upon the historic environment which do not involve development.

development rights) or making permission easier to obtain and implement (for instance, by allowing the principle of development to be established by a less onerous mechanism).

5. The deregulation of planning thus far has predominantly involved the third of these options, but the underlying threat to archaeology remains the same in each case. Many of the safeguards for the historic environment currently enshrined in the National Planning Policy Framework<sup>6</sup> (NPPF) assume an application for planning permission which will allow the decision-maker to require information and analysis before the application is determined and to impose conditions on any permission granted.

6. Without an application for planning permission the mechanisms legally to impose archaeological safeguards are often lacking and heritage assets are vulnerable to loss and damage. For example, the key policy requirement in paragraph 128 of the NPPF:

*'Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation'*

is unenforceable in the absence of an application for permission.

### **By-passing the application process**

7. The application process is increasingly being by-passed in a variety of ways including

*(1) the extension of permitted development rights*

The continuing, wholesale, extension of permitted development rights is removing an increasingly large amount of development from the scrutiny that accompanies a planning application. It is fair to acknowledge that much permitted development is small-scale and unobjectionable; that it can be, and often is, subject to general conditions and exclusions and will not override EIA requirements. Nevertheless, there remains real scope for loss or damage to nationally important but undesignated archaeological remains and wider damage to the historic environment generally.

*(2) local and neighbourhood development orders*

It is intended that concerns about the historic environment would be addressed before the making of such orders, but in most cases archaeological consideration is likely to be less than that accorded to a site-specific application.

*(3) the increased use of simplified planning zones*

Any move towards a zonal system of planning provides a serious challenge for the historic environment in England and would require more extensive 'front-loading' of the planning system.

*(4) parliamentary bills for major infrastructure*

Care needs to be taken to see that all heritage assets affected by development receive the same consideration that would be accorded to them through the ordinary planning process.

*(5) automatic granting of permission in principle to housing sites allocated in local and neighbourhood plans and on brownfield registers*

The granting of permission in principle<sup>7</sup>, itself, is of concern since it envisages the principle of development being established without full information and the ability to impose planning conditions.

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<sup>6</sup> See paragraphs 128 to 141

<sup>7</sup> See section 150 of the Housing and Planning Act 2016

This concern is even greater in relation to the provisions of the Housing and Planning Act 2016 which automatically confer permission in principle for housing development on sites identified in appropriate registers. Full pre-determination assessment and (where necessary) evaluation is not routinely carried out for the land availability assessments (such as Strategic Housing Land Availability Assessments (SHLAAs)) which inform local and neighbourhood plan allocations and are intended to be used to populate brownfield registers. Consequently, there is a real risk that sites will be granted permission in principle in the absence of appropriate archaeological desk-based assessment and field evaluation<sup>8</sup>.

#### (6) *planning freedoms schemes*

Section 154 of the Housing and Planning Act 2016 also empowers a local authority (following appropriate consultation) to disapply or modify '*specified planning provisions in order to facilitate an increase in the amount of housing in the planning area concerned*'. The potential for a local authority by this means to by-pass the need for a planning application in a given area cannot be discounted.

### Conditions

8. Planning conditions (or obligations) are crucial to ensure that appropriate and binding archaeological safeguards are in place and public benefit is delivered when development proceeds<sup>9</sup>. Even where an application is required, further limits have now been set upon the ability of local authorities to impose conditions. Section 14 of the Neighbourhood Planning Act 2017 (a) allows the Secretary of State to proscribe conditions of a defined type and (b) prevents a local authority from imposing a pre-commencement condition without the agreement of the developer.

9. Given the importance of pre-commencement conditions to the management and protection of the archaeological resource, the sector has focused primarily upon the latter provisions. Although an authority can refuse to grant permission if a developer does not agree to a necessary condition this provides a further 'turn of the screw' for local authorities already under intense pressure to grant permission for housing and other necessary development. Furthermore, the refusal of permission in such circumstances can only serve to undermine local authority decision-making and produce planning by appeal.

10. The Secretary of State's new power to proscribe certain types of condition has received less attention, but also has the potential adversely to impact upon archaeology. It has been suggested that conditions which render a scheme unviable should be prohibited. That is all well and good provided that it is always remembered that, where a condition is necessary to overcome a legitimate planning objection (for instance, where significant archaeological work is required), the planning application should be refused in the absence of such a condition. That, however, is not the intention of this provision, which is to allow development to proceed without having to comply with onerous and 'toxic' conditions (to use the rhetoric of Government in promoting the Bill).

<sup>8</sup> Although Regulations have been published which require authorities to be satisfied that the impact on heritage assets is acceptable before including a site on a brownfield register, the pressure for local authorities to populate brownfield registers with sites remains intense.

<sup>9</sup> See paragraph 36 and 37 of Historic England's Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment

### **Planning Policy**

11. The indications from Government to date are that the historic environment section of the NPPF is unlikely to change significantly in the near future. That is heartening, although with an ever-changing political landscape nothing is guaranteed. What is alarming, however, is the stream of proposals to revise other parts of the NPPF, most notably by increasing the weight to be accorded to policies promoting the provision of housing and other related development. Planning is ultimately an exercise in weighing counter-balancing factors and it would be facile to suggest that greater weight can be given to one side of the equation without affecting the considerations on the other. The direction of travel is inexorably one way.

### **Brexit**

12. Nor can the implications of Brexit be overlooked. The Great Repeal Bill may ironically (given its name) achieve its desired result of maintaining the status quo in the short term, but the United Kingdom's retreat from the European Union makes much of our environmental regulation (particularly those parts relating to environmental impact assessment) vulnerable to change in the longer term.

### **Resources**

13. Inextricably linked to planning reform is the issue of finance. It is the cause of, and rationale for, most if not all of the proposals and any proposed solutions which ignore the realities of public and private finance in the post-recession era are doomed to failure.

### **Conclusion**

14. The agenda for planning reform continues to be de-regulatory and to pose significant threats for the management and protection of the historic environment as it is currently undertaken. If the planning reform agenda does not change, archaeological practices may well have to.

#### 4. New models for advisory services: potential future roles for local authority archaeology services and Historic England

Online discussion 20<sup>th</sup> – 21<sup>st</sup> September 2017

Workshop 25<sup>th</sup> September 2017

##### Questions for discussion

1. To what extent are the current roles and functions of public sector (local authority and Historic England) archaeological services appropriate for the future?

What are the pressures and the opportunities for change?

2. What examples do we have of modifications/developments in regional and local structures that have occurred to date? How successful/unsuccessful have these been? Does practice need to change to meet new pressures? If so how?

3. Are there other ways, tested or untested, of delivering these services? What can we learn from new/different service models e.g. Wales; GLAAS; Worcestershire; South West Heritage Trust?

4. We have both local authority services and HE regional teams. Is this the most-appropriate division of labour/responsibilities? Would more-collaborative working, both regionally and nationally, be more effective?

5. What is Historic England's strategic role in respect of local authorities? How can Historic England and the rest of the sector work together, post-Howell Redesdale report and the Culture White paper, to sustain and develop local advisory services?

6. Statutory local authority services – is this a concept worth fighting for or is it a non-starter? Would improved definitions of services/standards/performance be beneficial? Should these be linked to funding and in what way e.g. payment by results?

7. A plan for the future: what are our short and long term priorities for change?

- Are there lessons we can learn from recent experiences in England and elsewhere?
- Are there changes we as a sector need to make to the way we do things? What short-term/long-term strategies exist/need to be developed?
- Are there specific legislative and/or policy changes that we need to lobby for?



## Background papers

### Introduction (Jan Wills, 2017)

This short background paper provides information to support online and workshop discussions of the future of local authority and Historic England advisory services. The focus is on archaeology services, rather than historic environment services as a whole, while recognising that integrated services are delivered by some organisations and that many of the local authority issues discussed below affect conservation officers as well as archaeologists. The focus is also on the services rather than the legislation and policy framework within which they operate, issues that were discussed in Workshop 3 and which are, of course, closely linked.

### ***Local authority archaeology services: background***

Archaeology services, established in English local authorities from the 1960s onwards, created embryonic records systems (later to become Sites and Monuments Records, SMRs), and sought to monitor and mitigate the impact of development, often through the maintenance of their own fieldwork staff and the use of government 'rescue archaeology' grants. The services were most commonly found in County Councils (often in museums), but were also created in many historic cities where the pace of post-war development and its impact on the historic environment had been perceived to be particularly severe. The services were actively encouraged and financially supported throughout the 1970s and early 1980s by the Department of the Environment (DoE) so that by the end of the latter decade there were County Archaeologists and SMRs in all counties in England, full national coverage being completed in 1989.

As Planning Policy Guidance 16 *Archaeology and Planning* (PPG16, 1990) introduced policies and procedures that transformed the management of archaeology through the planning system English Heritage followed through previous DoE support for local authority services, helping to fund the appointment of archaeological planning advisers where they did not yet exist. This recognised the crucial curatorial role that these staff were to play in providing the advice within the planning system that determined archaeological planning policy at local level, initiating the process of establishing the archaeological implications of individual development proposals and following this through to regulating archaeological fieldwork through specifying what was needed and monitoring its conduct. A further national initiative, following the publication of the *Monuments at Risk Survey* in 1998, enabled the creation of Countryside Advisers in many areas to address management issues in the rural landscape through (in particular) the use of agri-environment and other land management schemes.

Post-PPG16, the shape of the services was also fundamentally affected by the increasing separation of the advisory (curatorial) from the fieldwork role (consultants/contactors) as local authorities divested themselves of staff now providing a service paid for by developers. Some local authorities, however, still retain this dual role (and *cf* the four Welsh Archaeological Trusts).

In addition to the direct funding of posts by DoE/English Heritage (always intended to encourage local authorities to take on the post themselves after three years of tapered funding) there was strategic support in the form of grant-aided SMR (later Historic Environment Record, HER) enhancement. National programmes such as the Monuments Protection Programme, the National Mapping Programme, Historic Landscape Characterisation, the Extended Urban Surveys and Urban Archaeological Databases were carried out as partnerships between English Heritage and local authorities with direct programme-based funding that further enhanced the services' capacity. Many local authorities also developed their services to include

education and outreach programmes, acquiring Heritage Lottery Funding and utilising European money for this and other projects.

Local Authority services probably reached their peak in terms of size, budgets and range of activities in the early 2000s. They are non-statutory services but support the delivery of many statutory functions. While cuts in budgets since then (see below) may have reduced the scope of most services the core functions remain the provision of information and specialist advice on the management of archaeology (particularly that which is not designated) through the planning system, and more widely on the management of change in the historic environment that affects heritage assets with archaeological interest including sites, structures, settlement and landscapes. The ALGAO website currently defines '*four key functions*' for archaeology services within local government '*in order to encourage the identification, recording, protection, management, interpretation and promotion of archaeological sites and monuments*:'

- *To develop and maintain comprehensive public information resources (Historic Environment Records/Sites and Monuments Records) for the understanding and enjoyment of the historic environment.*
- *To ensure that all development and other land use takes into account the need properly to conserve the archaeological heritage.*
- *To conserve the historic environment by improved management through, for example, agri-environment schemes which can protect archaeological sites from the damaging effects of ploughing.*
- *To promote awareness, understanding and enjoyment of the historic environment through education and outreach programmes.'*

<https://www.algao.org.uk/localgov/>

### **Local authority archaeology services: recent trends and current issues**

Of critical importance to the successful delivery of the current system (post-PPG16) for managing archaeology are the information provided through HERs and the specialist advice on non-designated archaeology provided by Local Authority staff (Trow 2016). Local authority museums are also of vital importance as the recipients of the archives created (in particular) by development-led archaeological investigation; discussed during Workshop 1 this issue is not further considered here. In the three *21<sup>st</sup>-century Challenges for Archaeology* workshops to date the importance of the local authority input for the success of the current system has been stressed by participants, and trends in recent years affecting the level of that input have been identified as significant issues that threaten its successful operation.

#### *Funding*

Cuts in Local Authority budgets and reductions in the availability of external funding began to have an impact even before the financial crisis of 2007-8. However, beginning with the Comprehensive Spending Review of 2010, substantial cuts to public sector budgets have affected both Historic England and local government. Direct reductions in central government grants, and a parallel increase in demand from some priority services (especially adult social care), have led to reductions in departmental budgets (of 30-40% or more). Reduced Historic England budgets, and the completion or cessation of many national programmes, have also had a knock on effect on local authority services through reductions in grants. Smaller teams are also less able to bid for or utilise external funding.

As budgets have declined there has been an increased emphasis on charging for HER information and for advice; there is huge variation between local authorities in both the range and level of charging from none, to authorities which are seeking to support their specialist services entirely from such charges. Much of the potential to raise income from charging is, however, dependant on the amount and value of development locally. Recent government changes in policy regarding the level of planning fees, and their end use, may assist in the future support of specialist staff.

As the basis of local government funding changes around 2020, with the removal of the central government support grant and future dependence on council tax and business rates, the existing resource differences between local authorities is likely to increase, exacerbating regional differences.

### *Capacity*

The 2016 *Local Authority Staff Resources* survey undertaken by Historic England, ALGAO and IHBC, showed there were 271.7 FTEs providing information and advice on archaeology in local authorities in England, a fall of 33% since 2006. The 2017 survey (available in early September) is anticipated to show a further fall in numbers. While there is diversity across services, and it is difficult to generalise, consequences of this significant fall in numbers include a reduced range of activities, smaller teams and more authorities with a single specialist, some reductions in expertise, reduced service standards, a loss of senior staff as levels of management are reduced and a consequent reduced capacity to influence corporate policy directions. Some local authorities do not have access to the information and advice that they need, e.g. to implement government planning policy, or may source it externally only for a specific project. There is little up to date information from users on the impact of reduced capacity, although a recent survey in the south-west region identified negative impacts including reduced levels of service and less experienced staff while emphasising the 'vital role' that such services play 'in facilitating development in ways that add economic and social value without compromising heritage considerations'.

### *Structures*

Local government in England (following periodic restructurings), and the location of archaeology services within it, is diverse and continues to change on a piecemeal basis as authorities seek to save money by combining services with neighbouring authorities. From the outset many archaeological teams have been combined services e.g. counties delivering a service to both county and district authorities in two-tier areas, and lead authorities delivering to groups of authorities in metropolitan areas. While no radically different service models seem to have emerged in response to budget cuts there are some examples of outsourcing of services into trusts, and of the commissioning of private sector companies for certain tasks. Elsewhere in the UK the Welsh system of four charitable trusts, first established in the 1970s and delivering both curatorial and commercial services, provides an example of a different service model.

### *Policy and legislation*

The National Planning Policy Framework (2012) integrated planning policy for the historic environment into the mainstream and gave a clear role for local authorities in its protection but one that depends on access to appropriate information and advice. Since then there have been many planning reform initiatives to support (for example) government objectives in achieving house building targets. Some of these actual and proposed changes have the potential to erode key elements of the post-PPG16 system of protecting archaeology

through the planning system, e.g. the increase in permitted development rights, the introduction of Permission in Principle for specific categories of development and specific sites, and the questioning of the use of pre-commencement conditions. The full impact of these changes is not yet clear.

*Long-term aspirations for changes in the status of local government services*

Recognition of the importance of local government services, and of their vulnerability as non-statutory functions, led to many discussions in the 1990s about the need to make them a statutory requirement, and a number of attempts were made to insert clauses into proposed legislation to achieve this. A proposal that it should become a statutory duty for every local authority to either maintain or to have access to an HER was included in the draft Heritage Bill of 2008, with general political and sector support, but this Bill did not proceed into legislation. Since then HERs have gained status from the policies in the NPPF, and their role as the primary source of information about the local historic environment has been confirmed through the Historic England Heritage Information Access Strategy (HIAS).

Concern about local government services escalated within the sector as post-financial crisis budget cuts began to make an impact. In 2014 two members of the All Party Parliamentary Archaeology Group (John Howell MP and Lord Redesdale) were commissioned by the then Culture Minister (Ed Vaizey MP) to undertake a review of local authority archaeology services. The many submissions to the review provide a point-in-time statement of the situation in local government, while the recommendations suggested *‘a voluntary developer contribution which would establish a ring-fenced national fund which will help financially secure local authority HER services’* linked to agreed standards for authorities in receipt of the funding. It further concluded that, if the levy proved to be unsuccessful, *‘the government will also have to consider imposing a statutory duty to protect archaeology services’*.

Non-publication of the report, and changes in government, meant that there was little immediate follow up. The Culture White Paper (2016) committed Historic England to *‘identify how it can offer more support to local authorities, reduce demand on local services through clearer guidance, and encourage new delivery models that make the best use of resources, in the light of the review of local authority archaeological services’* (2.3, 36). A further commitment concerned the future of HERs: *‘We will ask Historic England to work with local authorities to enhance and rationalise national and local heritage records over the next ten years, so that communities and developers have easy access to historic environment records* (2.4, 39).

Since then discussions between Historic England and sector representatives have taken place, and it is anticipated that an update on progress in taking forward the first of these commitments will be available to inform discussions at the workshop. Work on HERs is being taken forward by HIAS (<https://historicengland.org.uk/research/support-and-collaboration/heritage-information-access-strategy/>)

In parallel with these most recent developments in England HERs in Wales have recently become a statutory service (as a part of a broader review and reform of legislation, policy and guidance) in the form of a duty for Welsh Ministers to ensure that an Historic Environment Record for each Welsh local authority area is compiled and maintained.

### *Conclusions*

Workshop discussions take place at a particularly uncertain time in public policy resulting from, for example, the decision of the UK to leave the European Union, continuing cuts in public funding and the changes in the financing of local government, and the extensive legislative programme necessitated by Brexit. There are risks and opportunities in the latter; there may be opportunities for productive legislative and policy change while there is also concern about potential changes to, for example, mechanisms for sustaining the rural environment post-CAP.

### **References and further background**

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**Historic England archaeology services: background** (Trevor Mitchell, Historic England, 2017)

Historic England is a consultee on a variety of consenting regimes which manage impacts on archaeological remains. Consultation criteria were last revised in 2015. Chief among these is Scheduled Monument Consent, which it processes on behalf of DCMS, providing advice to the Secretary of State. In 2016-17 it responded to 1,200 applications (1,150 in 2015-16). Consultation numbers for other regimes are as follows: Surveying (S.42) Licences: 166 (166); Protected Wrecks (S.1) Licences: 108 (208); Marine Licences (MMO responses): 258 (421). Historic England is also a consultee on planning applications for “development likely to affect the site of a scheduled monument “. In 2016-17 it responded to 9,228 consultations on planning applications in total (9,332 in 2015-16), of which only a portion related to scheduled monuments. It is not possible to accurately define the criteria under which any consultation was sent to Historic England. But the number of planning applications responded to in 2016-17 where the role of lead assessor was allocated to an inspector or assistant inspector of ancient monuments was c.1700. Historic England employs c.27 inspectors or assistant inspectors of ancient monuments within its regional Development Management teams. Raw averages for 2016-17 are therefore 44 SMC and 83 other consultations per head per year.

Historic England’s Development Management inspectors also provide pre-application advice on proposals affecting scheduled monuments and investigate unauthorised works and damage. Its Historic Environment Planning Advisers work to ensure that local plans have a positive strategy for the conservation of the historic environment, including sound policies covering archaeology. Its Science Advisers promote best practice by supporting local contractors and curators with technical advice. Research staff identify and assess sites and Listing staff make recommendations on the designation of sites to DCMS. These and other staff also contribute towards the management of archaeology in a variety of other ways.

**5. Synthesis of information from developer-funded investigation to create new historical narratives**

How can we transform recorded data from archaeological investigations into wider knowledge and new narratives?

Online discussion 25<sup>th</sup> – 26<sup>th</sup> October 2017

Workshop 2<sup>nd</sup> November 2017

**Questions for discussion**

1. What questions are we asking of the data? How is this moderated in the planning process?
2. In current excavations, are we collecting the right data to enable the full range of these questions to be answered?
3. How are we assembling the data to ensure that we are comparing like with like?
4. How are we organising the primary data to allow the greatest access for those wishing to synthesise it?
5. How are we ensuring the distinction between data and interpretation is clear for others using the information?
6. Are there scales of synthesis? If so, are there obvious candidates for funding and undertaking these different scales?
7. Should developers pay for synthesis? Is there room for an escrow model, where a percentage of the funding for every dig goes into a common fund? Should it be left to chance and circumstance, or does it need a formal programme?
8. How do we ensure synthesis informs subsequent investigations? What might this mean for backlogs?
9. What new technological approaches might assist synthesis?
10. How would we know things have changed for the better?

**Background paper** (Barney Sloane, Historic England, 2017)

As a result of the introduction of PPG16 in 1991 and its successor policies (PPS5 and the NPPF), more than 90% of archaeological investigation in England is now initiated by the planning process. Depending on the state of the economy, more than 5000 archaeological investigations can be carried out annually. These range from surveys to small-scale field evaluation and large-scale excavations. This commercially-driven research is joined by academic research in over 30 active university departments, and by community-led investigation. In the last 25 years, perhaps 80,000 investigations have occurred. Although some (perhaps 10%) of these excavations are formally published (through journals, monographs etc) and some 43,000 so-called 'Grey Literature' reports arising from work undertaken since 2005 are freely available online via the Archaeology Data Service, many more remain relatively inaccessible, lodged with local authority planning departments, HERs or, occasionally, still held by the excavator or client.

Reasonable concerns were raised at the time of the introduction of PPG16 - and in what was effectively a pre-Internet age – about our capability to digest and make sense of the expected deluge of data<sup>10</sup>, and to a considerable degree these fears were realised. However, in the last decade this situation has changed. We have begun to reap the potential of this vast body of data to contribute to new insights through a series of large-scale syntheses, undertaken primarily within academic institutions or as collaborations between universities and commercial archaeological practices, and funded either by major charitable trusts (eg Leverhulme), AHRC, and/or English Heritage (now Historic England). In 2005, Bradley was able to assert of his survey of the British and Irish later prehistory that *'we can now prove that good and useful work is being done: the challenge now is to make it [commercially led evidence] more readily accessible to ensure that it is put to good use'*<sup>11</sup>. In 2011, Fulford and Holbrook could claim that *'In the twenty-two years since the publication of Richard Hingley's Rural Settlement in Roman Britain there has been an increase in knowledge of several orders of magnitude'*<sup>12</sup>. And in 2013, Thomas noted of the value of large-area development-led investigations, that *'Their value is especially high when the results from multiple investigations are combined'*<sup>13</sup>.

The British Academy Reflections on Archaeology identifies (in academia) new kinds of archaeological enquiry and synthesis emerging, observing that *'Some archaeologists do not ever engage in fieldwork, their research instead relies on existing information often now in so-called 'big data' projects, building large databases of compatible information and analysing them digitally, with an especial emphasis on the spatial and temporal patterning of information'*.<sup>14</sup> And the development industry itself has seen the value of such projects. Melanie Leech, Chief Executive of the British Property Federation, in her foreword to *Building the Future, Transforming our Past: Celebrating development-led archaeology in England, 1990-2015*, said *'What particularly excites me is that university researchers are now using the enormous body of development-led*

<sup>10</sup> Cunliffe, B, 1990 'Publishing in the City', *Antiquity* 64: 667-71; Thomas, R, 1991, 'Drowning in data? - publication and rescue archaeology in the 1990s', *Antiquity* 65: 822-8

<sup>11</sup> <http://www.archaeologists.net/sites/default/files/ta56.pdf>

<sup>12</sup> Fulford and Holbrook, 2011 *Antiq J*, 91, , pp 1-23; doi:10.1017/s0003581511000138

<sup>13</sup> Thomas, R M, 2013 'Bridging the Gap? Scale and Development-led Archaeology in England Today', *Landscapes*, Vol. 14 No. 1, June, 2013, 92–102

<sup>14</sup> <http://www.britac.ac.uk/reflections-on-archaeology>



archaeology results as the basis for major national research projects, looking at the findings from hundreds of individual development sites<sup>15</sup>.

Despite this considerable advance, it is quite apparent that we are not yet confident or comfortable enough with the manner in which we synthesise data to ensure that it can regularly, intuitively and rapidly deliver advances in knowledge and drive future research questions.

Reviewing the progress of the Roman Rural Settlement project in 2011, Fulford and Holbrook observed that *'developer archaeology, by its very nature, has an inevitable focus on single sites or, in the case of infrastructure projects, groups of sites. Opportunities for synthesis have been rare.'* Commenting on the limiting scale of the undertaking, they calculated that University of Reading researchers had spent around 10 person years interrogating c.3,500 grey literature and published reports, making it likely that such syntheses would be a *'once in a generation event'*. They further recognised that the mass of developer-funded archaeology had *'engendered an urgent need to review our research aims in relation to the agricultural economy of Roman Britain and how we might achieve them'*.

Reviewing a very extensive synthesis of developer-funded later prehistoric archaeology in north-west Europe in 2015, Harding reminded us of the need for total synthesis: *'...whether one can write a prehistory of an area based solely, or even mainly, on rescue excavations... there is bound to be a tension between the story already known (from all kinds of fieldwork, not just rescue work) and the story that development-led work can produce. Neither is complete in itself...'*<sup>16</sup>

And in the case of the 'big data' projects – for example the University of Oxford's EngLaiD project – very considerable difficulties have been encountered in gathering and preparing national or regional data in a consistent format for interrogation at sufficient speed to fit the timeframes of even the largest research grants<sup>17</sup>.

Against this background of extraordinary potential and constraints of scale, access and methodology, the technological basis on which synthesis can be founded is changing very rapidly too. Along with extremely sophisticated Geographical Information and visualisation technologies, research infrastructure and common reference languages for archaeological datasets are emerging (ARIADNE, CIDOC Conceptual Reference Model)<sup>18</sup> along with semantic searching (where the *sense* and *context* of data can be searched, rather than just the appearance of a search term alone) are now routinely used in a wide range of sectors<sup>19</sup>. So brand new and very powerful tools are increasingly at our disposal.

<sup>15</sup> <https://content.historicengland.org.uk/images-books/publications/building-the-future-transforming-our-past/building-future-transforming-past.pdf/>

<sup>16</sup> [http://www.prehistoricsociety.org/files/reviews/Bradley\\_et\\_al\\_Later\\_Prehistory\\_final\\_review.pdf](http://www.prehistoricsociety.org/files/reviews/Bradley_et_al_Later_Prehistory_final_review.pdf)

<sup>17</sup> <http://www.oerc.ox.ac.uk/projects/englaid>

<sup>18</sup> <http://www.ariadne-infrastructure.eu/>; <http://www.cidoc-crm.org/>

<sup>19</sup> For example: Medicine (<https://academic.oup.com/bib/article/7/3/256/327857/Bio-ontologies-current-trends-and-future>); Tourism ([https://link.springer.com/chapter/10.1007/978-3-319-51168-9\\_14](https://link.springer.com/chapter/10.1007/978-3-319-51168-9_14)); Built Environment: <http://www.semantic-web-journal.net/blog/call-papers-special-issue-semantic-technologies-and-interoperability-built-environment>

Overseas, national approaches to synthesis have been developed. In Ireland, the INSTAR programme aimed to synthesise the results of numerous projects from the 1990s and early 2000s<sup>20</sup>, while in the US, a 'National Center for Archaeological Synthesis' has been proposed<sup>21</sup>

This conversation will not focus on the details of particular projects or specific approaches. Rather, it aims to open the debate about how we might aspire to a world where data and information are gathered and presented with the specific intent of ensuring that they can and will be accessed, synthesised and fed back into a virtuous circle to provide new narratives and set more pointed research agendas for future work. We will also explore who is best placed to fund and undertake synthesis. Workshop 6 in the 21<sup>st</sup>-century *Challenges for Archaeology* series will pick up the baton from there, considering issues of publication.

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<sup>20</sup> <http://oldsitehc.info/seandalaiocht/tionscnaimh/instar-web-archive-grant-programme/?L=3>

<sup>21</sup> Heilen, M, Ciolek-Torello, R, and Grenda, D, 2016 'Enabling Archaeological Research within a Cultural Heritage Management Context: A View from the United States', in Novaković, P, Horňák, M, Guermandi, MP, Stäuble, H, Depaepe, P & Demoule, J-P (eds.) *Recent Developments in Preventive Archaeology in Europe Proceedings of the 22<sup>nd</sup> EAA Meeting in Vilnius, 2016*  
<http://www.ff.uni-lj.si/sites/default/files/Dokumenti/Knjige/e-books/recent.pdf>

## 6. Challenges for archaeological publication in a digital age

Who are we writing this stuff for, anyway?

Online discussion 29<sup>th</sup> and 30<sup>th</sup> November 2017

Workshop 7<sup>th</sup> December 2017

### Questions for discussion

1. How much do we know about our profession's usage of publications? Do the findings and recommendations of the 2001 *From the Ground Up* report still apply? Have they been implemented?
2. Do we need a new and more prescriptive professional standard and guidance for grey literature reports and for our academic publication channels?
3. Is our profession clear when and why we publish reports as grey literature; on-line; as journal articles or as monographs? Who decides and on what basis?
4. Are we clear on the boundary between 'publication' and 'archive' and does this need to change? And do we know how to create a usable digital documentary archive and have we adequate professional standards and guidance in place?
5. If we can access most information on line, what should the 'main' report on an archaeological intervention comprise? Evidence, synthesis or a popular account? Should any of it be in hard copy?
6. Does professional or popular hard copy publication derived from excavation reporting still have a role to play? If so, what, why and how?
7. How can we improve public engagement with what we are writing without neglecting our professional and academic responsibilities to publish?
8. If we were to start again what would be our ideal form(s) of archaeological publication?

## **Background paper** (Steve Trow, Historic England, 2017)

How we can secure and enhance the public and academic benefits of archaeological publication at a time when most archaeological fieldwork is carried out by the commercial sector and when digital technologies are challenging traditional models of dissemination?

The challenges of archaeological publishing are not new. Indeed, it would seem that our publishing has been facing a crisis at least since the 1970s when the Frere Report of 1975 attempted to address it. The issue was again revisited by a joint working party of the Council for British Archaeology and the Department the Environment, chaired by Barry Cunliffe, which reported in 1983. Another committee, convened under the auspices of the Society of Antiquaries, tried to address the issue in its report of 1992 – now with the added complexity of developer-funded investigation. In 1998, in the face of concerns about both ‘grey literature’ and formal publication, the CBA was commissioned to carry out a wide ranging survey of publication and make recommendations based on user needs. The report, published in 2003, can be seen at: [http://intarch.ac.uk/journal/issue14/puns\\_index.html](http://intarch.ac.uk/journal/issue14/puns_index.html) and the recommendations are attached below.

All this and more is admirably summarised in a short essay by Julian Richards which can be seen at <http://intarch.ac.uk/journal/issue15/7/jr1.html>,

and is also included below.

Notwithstanding this continued scrutiny by the profession, on the topic of publication the 2011 report by the Southport Group concluded:

‘Looked at through the lens of Total Economic Value, there appears to be an over-reliance on publication in what were described to us as ‘large dusty academic journals’, with a lot of technical detail but very limited public readership. These generate high use value for scholars but very little for the public at large.

Moreover, for about 5% of archaeological digs there is also a monograph produced, usually by the organisation that did the excavation. These beautifully printed volumes have a very small audience – with somewhere between 250 and 500 copies printed depending on the size and amount of people involved with the project. Another issue around publication is the long delay between the initial investigations and the final output, be it publication or museum display. Not only does the analytic process from excavation to publication and/or deposition often take years, but the amount of emerging material is so large it is difficult for those even within the field to keep up with it.’

While the profession continues to consider how best to record and report its fieldwork outcomes, the wider world of academic publication also continues to evolve. Government has embraced ‘open access’ for publicly funded research; the death of the monograph is considered either imminent or much exaggerated; libraries are considering whether to alter radically collection policies; academics are allegedly writing more than can be assimilated; and Research Councils and others are investing in new thinking on the Academic Book of the Future, see: [https://academicbookfuture.files.wordpress.com/2017/06/academic-books-and-their-futures\\_jubb1.pdf](https://academicbookfuture.files.wordpress.com/2017/06/academic-books-and-their-futures_jubb1.pdf)

**Recommendations from 'From the ground up. The Publication of Archaeological Projects: a user needs survey', (CBA 2003)**

(the opening workshop discussion reviewed progress with these recommendations)

**1 Clarify vocabulary**

'Publication' is often used to mean 'printed report', while 'dissemination' has become a synonym for 'publication' – a sense that is obsolescent in the digital age. We recommend that as far as possible 'publication' is used to mean the completion and issue of a substantive report, regardless of medium.

**2 The form and scale of publication should be governed by the significance and scale of results**

The report highlights the fallacy of 'preservation by record', whereby a printed report was expected to contain all information necessary to reconstruct the deposits or fabric which had been disaggregated. The survey also indicates that published reports are never going to provide enough detail to satisfy all needs (cf Recommendation 3). Indeed, it emerges that many fieldwork publications provide too much detail for the general reader, and too little for the specialist. In the abstract, it is difficult to disagree with a conclusion of an important 1991 Society of Antiquaries report (*Archaeological publication, archives and collections: towards a national policy*) that print publication must be selective, and that selectivity should be based on the principle that *'the form and scale of [a] publication should be commensurate with what the results have to offer rather than a mechanistic process which is applied regardless of the quality and potential of the data concerned.'* We recommend that this be accepted. In practice this will require a more clear-cut, knowledgeable, and hence respected, peer-review system than always obtains at present.

**3 Multiple forms and media of dissemination should be used, as appropriate for a given project**

The survey reveals that fieldwork publications are used for many different reasons, and that each constituency has its own spectrum of needs. While this may seem self-evident, the practical implication of the truth that a single print publication for one project cannot usually satisfy even a majority of expectations has not hitherto been acknowledged. For the future, we recommend that a suite of means be employed, each tailored to particular purposes or audiences, which in the aggregate could be regarded as 'publication'. The balance of means would vary from project to project, but could include:

- summary announcement whilst work is in progress and/or shortly after completion (cf Recommendation 4)
- synthetic journal article or monograph, of concise form
- internet publication either alongside or instead of the above
- electronic availability of detailed and well-indexed structural and specialist reports
- all project archives to be placed on the Internet

Taken together, such means offer the opportunity to reverse the threat of attenuated publication which has resulted from the pressures of print costs, while providing wider and easier access to material, catalogues and specialist discussion. The main foreseeable risk lies in the diffuseness that could result if each element were to be pursued on its own. Layered or multi-media publication will accordingly require special attention to overall structure, to ensure coherence, not only in content but also in referencing and recognised means of citation. We recommend that experimental projects be set in hand forthwith.

#### **4 New and better means be found for tracking work in progress and providing summary notice of recent work**

The survey finds a near universal suspicion that more is being done, published or archived than any individual can reasonably ascertain from existing sources, and that there is geographical limitation in what is regularly scanned. In 1991 the lukewarm reception accorded to the Society of Antiquaries' idea of an annual compendium was in part the result of a feeling that such a publication would be expensive (demanding either a high subscription or subsidy), cumbersome, incomplete, difficult to sustain, and to some extent duplicatory. An electronic compendium could be a different story. Among other things, such a system, if adequately resourced, could:

- list fieldwork and other research in prospect and progress, for all branches of the discipline
- index its listings to assist rapid interrogation from any standpoint (eg, by period, historical theme, scientific or artefactual specialism)
- be regularly and rapidly updated, enabling anyone to ascertain the stage to which a given project has progressed
- indirectly, assist peer pressure to ensure that publication is prompt and adequate
- overcome some of the problems associated with grey literature and archives: for example, by signposting where they are, or how they can be obtained or accessed
- provide an electronic gateway to archives which themselves are electronically available or indexed
- answer enquiries from those who do not themselves have electronic access
- be cross-referenced with the British & Irish Archaeological Bibliography
- be available for quarrying by the editors of existing annual regional or thematic listings (that is, the system would be designed to complement existing services, not compete with them)
- assist the news media
- broker research connections and contacts
- enable English Heritage's assessment gazetteer to be discontinued
- be susceptible to technical development without loss of continuity

The realisation of these and other strengths would obviously require the co-operation of the discipline, and be proportional to the extent to which comprehensive coverage could be achieved. However, the advantages would be so large (and the survey reveals an immense sense of need in this area) that we believe such support could be relied upon. This is a proposal that would help everyone, including specialist sectors, universities, and independents as well as professionals.

It remains a question whether such a tracking system would best be established by the upgrading of an existing service, through a new universal consortium, or through the partial amalgamation or patching together of a number of current initiatives such as OASIS (Online Access to the Index of Archaeological Investigations), DAPPER (Digital Archive Pilot Project for Excavation Records) and Archaeological Investigations Project.

#### **5. Funding and editorial policy be refocused to encourage the production of more synthetic fieldwork publications, with integration of description and interpretation, greater integration of structural and artefactual evidence and greater attention to narrative style**

This recommendation will be controversial in that it requires a departure from the orthodox model. Nevertheless, the survey indicates that the present situation is itself far from satisfactory. A concerted policy shift is required to bring about change. This should only take place alongside the use of the additional means of making detailed information about specific categories of data available to researchers (as outlined in Recommendation 3 above and 7 below).

Such changes may well require corresponding changes in fieldwork practice (eg, recording strategy or working relationships between fieldworkers and specialists), and a full consideration of such issues should accordingly take place in advance of policy implementation. For example the survey disclosed a widespread perception that not all excavators display the same degree of pithiness that they expect from specialists. Better balance, to be achieved through stronger academic focus, is called for, and must begin with the assimilation of specialist considerations at the stage of research design.

Such changes would also impact on opportunities for career development and the acquisition of scholarly esteem through publication. We therefore emphasise the needs to encourage multiple authorship by specialists and directors (which the steps proposed in Recommendation 3 would assist), and/or to promote new prestigious formats for dissemination. Funding agencies, larger units, universities and independents all have a part to play in encouraging the integrated reports that many would like to read but few actually write.

#### **6. Funding and editorial policy should facilitate and encourage authors to consider electronic publication either instead of or in conjunction with print publication**

(cf Recommendation 3)

#### **7 Detailed structural and specialist reports be published on the Internet**

One of the survey's significant findings is that while archaeology relies heavily on specialists, the specialists themselves feel their work to be increasingly squeezed. Moreover, while the discipline as a whole is calling for greater integration in the writing of reports, and the study of assemblages as distinct from nineteenth century classifications based on material alone, this is not widely reflected in what is actually being written. New means of making detailed structural and specialists reports available are required – a need that is well answered by electronic media. It is important that this should not take place *ad hoc*. Rather, we propose the establishment of a specific forum, where work can be indexed and accessed with ease, and where peer review ensures that such publications provide improved means of attracting academic recognition.

#### **8 Archives be made available on the Internet**

The survey found strong support for the mounting of all archives on the Internet, supported by wellindexed and queryable databases. Funding agencies and local authorities should consider making this mandatory for projects within their remits. These should be integrated with electronic publication of reports (cf Recommendation 6).

#### **9 Systematic attention be paid to editorial training, with consideration given to more extensive funding of editorial posts**

Kenneth Aitchison's *Profiling the Profession* survey (CBA/English Heritage/IFA 1999) reveals archaeology's editorial community to be startlingly small, and (in professional terms) for the most part either relatively low

paid and junior, or honorary and hardpressed. Aside from the fact that this amounts to an inbuilt production bottleneck, reports will only improve in content, structure and articulation (all things which colleagues say they would like to see) if the editorial aspects of their production are considered much earlier in the report-producing process, and if experienced editors are on hand to ensure that such consultation translates into better-written, better-focused publications. The central funding, if only for a limited time, of a modest number of additional editorial posts at strategic points in the discipline would help to strengthen and bring prestige to an area of archaeology which is at present dangerously fragile, and improve the mentoring of upcoming colleagues. More systematic attention to editorial training would also be desirable, and some university teaching about the writing of excavation reports – especially issues of structure, balance and the basics of clear style – would pay dividends for the discipline as a whole.

#### **10 Financial support for local, regional and national society journals be increased**

The survey highlights the immense value of local, county, national and thematic journals. Such periodicals are vehicles for publication with associated peer review systems, editorial provision and audiences. It is easy to take them for granted, yet without them the discipline would struggle. It would be just as easy to assist them, for example to ascertain what kinds of help honorary editors most need (in some cases, indeed, whether it is realistic to expect that they should remain honorary). While this lies towards the margins of what the survey investigated, we detect signs of strain in this area. It would be in the mutual interests of societies and funding agencies to review their relationships.

#### **11 There should be a fundamental review of commercial assumptions**

The survey demonstrates little correlation between publication sales and publication use. Admittedly, the survey's citation study was disappointing, but enough has been gleaned to explode the fallacy that small sales figures automatically equate with low usage. Although it did not emerge from the survey, we also draw attention to the fact that the costs of producing and distributing a technical publication may be trivial in comparison with the preceding costs of fieldwork and analysis – so much so, indeed, that if dissemination of knowledge is the underlying aim, it would arguably be as reasonable to give the publication away as to sell it. A root-and-branch review of commercial assumptions is called for.

#### **12 National agencies should review their responsibilities for addressing the consequences of commercially driven archaeology**

Much of the fieldwork currently being reported upon is development-driven. The principle of 'commensurate publication' (cf [Recommendation 2](#)) is not always easy to realise in the commercial context, where some developers have their own views about the extent of their responsibilities, and local planning authorities may feel inhibited in what they can insist upon. We recommend that national agencies, particularly English Heritage (as the adviser of DCMS) should shoulder more responsibility for addressing these issues, which ultimately stem from PPGs 15 and 16, and their derivatives. In part this means seeking to establish a climate in which both contracting and curatorial archaeologists are in a position to urge publication that is intellectually appropriate and publicly satisfying.

#### **13 Funding bodies and peer-review panels should acknowledge the interdependency between publication and the scholarly development of individuals in their careers**

This issue is fundamental to the well-being and productivity of the discipline. Change can appear to be



threatening, and it is important that the changes recommended above should be perceived by fieldworkers and specialists alike as supportive and progressive rather than cautious or undermining. It is for those who commission or influence the commissioning of fieldwork to ensure that this is the case.

**14 National agencies should develop management frameworks and funding structures to facilitate the production of regional, period and thematic works of narrative synthesis**

The survey highlights concern about the relationship between fieldwork publications and the production of broader works of synthesis. Given that there are increasing pressures on archaeologists' time, increasing volumes of new material being produced through commercial funding, and growing difficulties in finding out about or accessing this material, this is not surprising. We argue that the discipline can no longer rely on those sectors traditionally concerned with synthesis – notably university archaeologists – to answer this need. Alongside personal research, therefore, we point to the necessity for national agencies to support initiatives for the systematic production of regional, thematic and period syntheses.

**15 The conclusions and recommendations contained within this report should be widely disseminated throughout the archaeological discipline**

© Internet Archaeology URL: <http://intarch.ac.uk/journal/issue14/4/recommendations.html>

### **Background paper: Publication and archiving (Julian Richards, 2004)**

There is a tension in the publication of archaeological fieldwork results between a synthetic readable account, accessible to the intelligent layperson which 'tells a story', and the scientific presentation of interpretation backed up by supporting data. One school of thought, often credited to Pitt-Rivers and described as the Cranborne Chase tradition, believes that the published excavation report is the factual and complete record of a site:

'A discovery dates only from the time of the record of it, and not from the time of its being found in the soil' (Pitt-Rivers, cited in Wheeler 1954, 182).

For Pitt Rivers, publication provided an objective record of what had been discovered and it was the archaeologist's duty to publish in tremendous detail, as demonstrated by his own four massive volumes on the excavations he conducted on his estate (Pitt-Rivers 1887-98).

On the other hand a different emphasis is visible in Flinders Petrie:

'To empty the contents of notebooks on a reader's head is not publication. A mass of statements which have no point, and do not appear to lead to any conclusion or generalisation, cannot be regarded as efficient publication' (Petrie 1904).

Notwithstanding this early plea for synthetic publication it was the Cranborne Chase tradition that was to have the greatest influence on publication trends, although the tension between brief synthetic publication and full data presentation has periodically re-emerged. Throughout the first half of the 20th century, publication was seen as an integral part of the excavation process. In much of the literature there was little mention of archiving: the only record considered effective was full publication — the published report and the archive were regarded as one and the same thing (Jones *et al.* 2001, Section 2).

During the 1960s and 1970s, however, British archaeology had to face up to a growing publication crisis. Against a background of massive growth in public spending on archaeology there was increasing archaeological activity and rescue excavation, a growing post-excavation and publication backlog, and soaring publication costs. The Frere Report (1975) attempted to address the crisis. It endorsed the traditional view that archaeologists are under an obligation to produce a full record of their excavations but accepted that, given the crisis, publication in printed form of all the details of a large modern excavation is no longer practicable (Frere 1975, 2). The Frere Report advocated a rationalisation of recording and publication. Four levels of recording were held to characterise the successful completion of an excavation (Frere 1975, 3): and artefactual/environmental data

- Level I — the site itself and the excavated finds
- Level II — the site notebooks, on-site recording forms, drawings, finds records, photographs etc.
- Level III — the processed complete archive: full illustration and description of structural, stratigraphic and artefactual/environmental data
- Level IV — a synthetic description with supporting illustrations

Hitherto, full Level III publication had been the norm, at least in theory, but refined publication at Level IV was now recommended, on condition that a Level III report was produced for archiving and was readily available on request. It was recognised that selectivity at Level IV would require a higher standard of

archiving than was often practised, with all excavation records being properly organised, curated and accessibly housed. Consideration was also given to other, cheaper, forms of dissemination at Level III on request. In essence, the Frere Report responded to the publication crisis by advising a reduction in the amount of material that would go into print in monographs and journals, coupled with an improvement in the organisation and curation of archives.

The Frere Report was the first attempt by a state heritage body to address systematically the principles and methods of publication. With hindsight, it can be argued that Frere did not constitute a radical departure from traditional practices. All that the Report advocated was an uncoupling of an accepted standard of record (known as the Level III report) from the process of formal publication (Level IV). It was a pragmatic response to the costs of formal publication and the pressures on publication outlets (Jones *et al.* 2001). Theoretical doubts were expressed which challenged some of the assumptions underlying Frere, including the idea of *preservation by record*:

'there is no way whereby a reader can assess and verify the skill of the excavator in recognising, dissecting and recording the primary data. It is the inevitable limitation of excavation as a means of recovering evidence that what is destroyed unnoticed is gone for ever. In simple logic we can never know what the excavator has failed to recognise, or what he fails to tell us about' (Alcock 1978, 3).

Although Frere's recommendations were very influential on archaeological practice it is arguable whether they had much impact upon the backlog brought about by increasing numbers of large projects. Indeed, the high standard of preparation required by Level III meant that in many cases *more* time was required for post-excavation work than had been allocated before. The continued publication crisis led Tom Hassall to suggest that the balance between publication and archive might shift totally in favour of the archive:

'...professional advancement and success in the future ... may depend on non-publication, but deliberate non-publication backed up by a total and readily accessible archive...' (Hassall 1984, 151).

The backlog problem refused to go away, and a joint working party of the Council for British Archaeology and the Department the Environment was convened under the chairmanship of Barry Cunliffe. With an emphasis on the importance of an accessible archive, and on targeted research and publication, the Report (1983) marked a departure both from the traditional model, with its ideal of full excavation and full publication, and the Frere Report, which had confined the latter to Level III. The detailed description of the evidence was to be reduced to a summary, with detail confined to microfiche. The report had considerable impact but its implementation was problematic and was rejected by the CBA's own Council. With the benefit of hindsight it seems that one of the main problems was practical and stemmed from difficulties with the technology of the 1980s. At that time no archive could truly be accessible, and the use of microfiche was universally loathed. Another difficulty was increasing theoretical debate about whether the full report actually represented a complete factual account of the site. Barrett (1987) argued that the publication crisis extended beyond report production to the ways in which archives and reports could be used and re-used. Although it may be impossible to judge an excavator's general competence from a published report, it is possible:

'for the reader to undertake a critical analysis of the internal logic of the report, examining the linkages between the assumptions employed, the stated record of observations, and the interpretative account.'

Hodder (1989) regretted that reports had become impersonal objective accounts of data. He argued that since the excavation process is interpretative from start to finish, personal factors which lead to the interpretation should, as far as possible, be written into the report rather than kept out of it. In other words, there should be *greater* integration between description and interpretation. Another perspective, criticising the use of synthetic reports as the main format of dissemination of archaeological knowledge was provided by Shanks and Tilley (1987). They argued that such reports represented exercises in *domination and control* by individuals seeking to impose their view of the past on their readers. It was therefore crucial to find ways to make data available to give a wider audience the opportunity to create their own interpretations.

One further Committee, convened under the auspices of the Society of Antiquaries, tried to address the publication/archives problem. *Archaeological Publication, Archives and Collections: Towards a National Policy* (Carver *et al.* 1992) was written within the context of the introduction of developer-funding. It was becoming apparent that the majority of small-scale archaeological interventions conducted under PPG16 did not warrant publication, although they might at some stage contribute to broader syntheses, so long as there was some provision for the significance of their results to enter the public and academic domains (Darvill and Russell 2002). The Society of Antiquaries Report also took account of those developments in theoretical thinking which reflected a move away from the Cranborne Chase tradition and away from *preservation by record*:

'since the record is selective and therefore incomplete and post-excavation analysis must also, of necessity, be selective, the excavation report can only be a contemporary statement reflecting on aspects of the site: it cannot be an immutable and complete truth.' (Carver *et al.* 1992, 2.2.1).

The Committee took the Cunliffe Report one stage further and recommended that dissemination should normally be in the form of a published summary report and an accessible site archive. Once more, however, technology lagged behind and lacked the means of providing access to an archive with links between it and the summary publication. The report was effectively shelved.

Meanwhile, the publication crisis also became an archiving crisis as museums were expected to receive the physical archives from the backlog projects. There was a growing feeling that archives were important, but that their content and accessibility required reassessment (McAdam 1999). However, a survey conducted on behalf of English Heritage and the Museums and Galleries Commission revealed that museums had also reached breaking point; most were running out of storage space, few could provide facilities for access, and almost all reported low levels of usage (Merriman and Swain 1999, 259-60).

In 1998 the CBA was commissioned to carry out a wide ranging survey of publication. This ran in parallel to the Digital Data Survey conducted by ADS, and also focussed on user needs. Its recommendations reflect the fact that technology has moved on, and whilst they again focus on reducing the scale of conventional publication the PUNS Report recommends alternative means of electronic publication and the dissemination of archival and specialist material in electronic format as a means round the practical problems. The introduction of digital technology provides an opportunity to shift away from pure synthesis towards making archaeological data accessible digitally (Gaffney and Exon 1999). Three recommendations (Jones *et al.* 2001, Section 6) are of particular relevance in the context of this article.

*Recommendation 3* recognises that there are different user groups for different aspects of a report and suggests multiple forms and media of dissemination should be used, as appropriate for a given project. These might include a summary account produced during the project or immediately after; a

synthetic journal article or monograph; Internet publication either alongside or instead of the above; and electronic availability of detailed and well-indexed structural and specialist reports. Recommendation 3 also concludes that all project archives should be placed on the Internet.

*Recommendation 7* also notes that new means of making detailed structural and specialists reports available are required, a need which is well answered by electronic media, notably the Internet. The CBA argue that it is important that this should not take place *ad hoc* and propose the establishment of a specific forum, where work can be indexed and accessed with ease, and where peer review ensures that such publications provide improved means of attracting academic recognition.

*Recommendation 8* also reflects the fact that the survey found strong support for the mounting of all archives on the Internet, supported by well-indexed and queryable databases. It recommends that all archives be made available on the Internet and suggests that funding agencies and local authorities should consider making this mandatory for projects within their remits, integrated with electronic publication of reports.

Simultaneously, English Heritage published a follow-up report to the original English Heritage/Museums and Galleries Commission archives survey, making a number of recommendations to take things forward (Perrin 2002). The report recognises 'the potential of digital information to open up archaeology' (Perrin 2002, 6). One immediate result has been the establishment of an Archaeological Archives Forum with representatives from all the key stake-holders. The Museum of London has demonstrated what is possible with the opening in February 2002 of its London Archaeological Archive and Research Centre.

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