The future of local government archaeology services

A submission from the Council for British Archaeology (CBA)

The Council for British Archaeology is pleased to have an opportunity to respond to the call for written evidence in relation to the inquiry for the Culture Minister in England on the future of local government archaeology services.

The Council for British Archaeology is an educational charity working throughout the UK to involve people in archaeology and to promote appreciation and care of the historic environment for the benefit of present and future generations. We have a statutory role as one of the national amenity societies consulted on listed building proposals. Our membership includes over 620 heritage organisations, representing national, regional and local bodies encompassing state, local government, professional, academic, museum and voluntary sectors, and over 10,000 individual members.

The existing models for local government archaeology services

1. Do you consider the present system of advice provided from and to local authorities of different types to be working satisfactorily and to acceptable professional standards?
   a. Do you have evidence of local authorities acting without archaeological advice, or with clearly inadequate provision? Which are they?
   b. Do you have evidence of local authorities planning or considering acting without archaeological advice, or with clearly inadequate provision? Which are they?
   c. What trends have you identified?

   Please give examples where possible.

The system in England to provide archaeological advice to local planning authorities has grown up in a piecemeal fashion over several decades. The current approach is largely based on the Government’s policy introduced in 1990 through its Planning Policy Guidance Note 16 (PPG16), linked with the planning system introduced through the earlier Town & Country Planning Act. PPG16 embedded archaeology firmly within the planning system and required local planning authorities to maintain or have access to expert professional advice, including information held in a Historic Environment Record. This policy has been continued in the National Planning Policy Framework, introduced in 2012. Archaeology advisory services also inform the management of the rural historic environment, and are well placed to undertake community outreach and education. They also, in many places work within broader teams of specialists, including ecologists, conservation architects and landscape architects, informing development management and planning policy.
The current national policy framework provides an adequate basis for archaeological advice to be delivered to a high professional standard. The adoption of the Standard and Guidance for Archaeological Advice by Historic Environment Services (http://www.archaeologists.net/sites/default/files/node-files/IASG-Archaeological-Advice-and-glossary.pdf) by the Institute for Archaeologists in October 2013 clearly defines the professional standards that are expected. Across most of England the existing services operate in line with IfA standards, although reducing resources have placed considerable strain on the expert staff who provide the advice, and there are significant concerns about the ability of services to continue to meet these standards in future in many areas, particularly in the north of England and the Midlands.

We know from previous experience in Northamptonshire that in a situation where a local planning authority does not have access to archaeological advice it leads to the destruction of archaeological sites without adequate record, the loss of public benefit, and also increases risks (and potentially costs) for developers. Unfortunately the full scale of this negative impact is hard to measure due to the absence of any monitoring of the situation during that period.

There are now local authorities that have chosen to withdraw from previous arrangements for receiving archaeological advice. In some cases these local authorities suggest that they will use consultants to provide cover – although this begs the question of who will judge when consultants are required – but in some cases (eg Middlesbrough) there is no advice being sought at all. This appears to be in direct breach of the NPPF.

From surveys undertaken by the Association of Local Government Archaeological Officers (ALGAO) and the Institute of Historic Building Conservation (IHBC) with English Heritage (see latest report at http://www.english-heritage.org.uk/content/publications/publicationsNew/guidelines-standards/fifth-report-la-staff-resources/5th-report-la-staff-resources/5th-report-la-staff-resources.pdf) it is clear that the number of historic environment specialists advising local authorities has dropped in recent years (staffing numbers have fallen by 28% since 2006 for historic environment advisors, including an 18% fall in archaeological advisors, with a 3% fall in the last year). It is anticipated that the reductions will continue and the pace of the reductions is accelerating as funding cuts within local authorities continue and have a greater impact on non-statutory services. There are reasonable fears that the number of local authorities operating without archaeological advice will increase in the coming years, and that even where services remain they will not be adequately funded to fulfil their role to a professional standard. This will be particularly apparent in the quality of the Historic Environment Record, in many cases already suffering from lack of resources. The HER is the key evidence base for local and regional decision making.
2. What are the consequences of inadequate provision of archaeological advice to local authorities? The inquiry is particularly interested in the real or potential
- loss of archaeological sites without intervention
- loss of public benefits from participation opportunities, dissemination of the results of archaeological work, archives of the products of that work and interpretation via museums
- increased uncertainty and cost for developers
- failure to target advice and grants in rural areas
- loss of essential archaeological skills

All of these options are a real possibility as a consequence of inadequate archaeological advice to local authorities. This is not in the interests of the public, the planning authorities, the developers, or the historic environment sector. It is particularly damaging for our archaeological heritage as important evidence can be lost forever with no record made, and no opportunity to even gain an understanding of the significance of the loss.

Alternative models for providing planning advice

The inquiry will consider other models for the provision of archaeological advice to local authorities,

3. What other models in England, elsewhere in the UK, or further afield would you like to draw to the inquiry’s attention?
   a. What are their advantages and disadvantages?

The models in England are already diverse, with single authority services, shared services between authorities, provision of advice to second-tier authorities from a first tier authority, use of commercial providers, and in London the advice is provided by English Heritage. Elsewhere in the UK the obvious alternative model is the system in Wales where archaeological advice is provided to local authorities by the four regional Welsh Archaeological Trusts with some core funding provided by Cadw. This ensures a more stable and appropriately resourced approach, but there are issues of perceived independence as the Trusts are also contractors bidding for development management related work. There are also perceived issues of democratic accountability as the services are provided outwith the local authorities, however this does not appear to have any significant impact on the public benefit delivered. In Northern Ireland the advice to local authorities is provided centrally via the Northern Ireland Environment Agency, however this is realistically only feasible due to the smaller scale of the geographical area covered.
4. What role could the proposed Historic England play with local authorities and other partners to create a national framework of heritage protection?

There is an important opportunity with the creation of Historic England in 2015 to consider a national approach, delivered locally, to enhance the heritage protection systems currently in use. Consideration should be given in drafting the corporate plan for Historic England to include collaborative working with partners on a regional and/or sub-regional scale, where appropriate, to ensure that local authorities continue to have access to appropriate professional advice in relation to the historic environment. We expand on this option in our answer to question 7.

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

Maritime archaeology is a specialist field with particular issues that need to be considered in relation to marine planning and the protection of underwater cultural heritage, which differ to the terrestrial system based on the Town & Country Planning Act. Currently the approach to the investigation and protection of maritime archaeological heritage in the marine zone is covered by English Heritage and below the low water mark there is no role for local authorities.

The CBA is working with partners including Museum of London Archaeology (MOLA) and the Nautical Archaeology Society to put in place a network of local groups who can monitor the coastline, particularly in the intertidal zone, to identify archaeological sites and report them appropriately. This will build on the successful Thames Discovery Project, and the work of the Portable Antiquities Scheme which encourages the reporting of finds and aims to transfer information to HERs. A programme of public education is needed, particularly with current levels of coastal erosion and storm damage uncovering new sites, to encourage anyone who finds archaeological material to report it to the appropriate authorities.

Outside the intertidal zone, out to the 12nm limit, a more regional approach to the provision of archaeological advice to appropriate marine authorities might be appropriate, if it was adequately resourced, with the involvement of Historic England.

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

The standards rightly focus on the key principals for delivery of a professional advisory service to local authorities. The mechanisms for delivery can vary, but must deliver the defined level of professional service. There is a perception, held by developers and their agents and consultants, that there is an inconsistent approach between different
authorities across England, with some requiring more intervention in advance of development and more rigorous approaches to required mitigation. ALGAO and the IfA both have a potential role to play in working with colleagues in archaeological advisory services to ensure that a proportionate and consistent approach is being adopted across the country.

Updated benchmarks are needed for HERs which focus on outcomes, as much as on inputs.

A key issue for consideration is not necessarily professional oversight of standards of archaeological work, but oversight of the work of local planning authorities by the Government to ensure that they are working in line with the NPPF and providing adequate resources to enable professional archaeological staff to provide advice in line with sector-produced professional standards and Government planning policy.

Your recommendation

7. What would be your preferred model for the provision of archaeological advice?

   a. Is your preference for continuation of the status quo?
   b. If not, which model or models for alternative provision would you recommend, and why?

The status quo has generally worked well in recent years, but there are areas where significant improvements could be made. Historic Environment Records, generally poorly funded, could play a much greater part as a robust evidence base better revealing the significance of the historic environment and delivering substantially enhanced public benefits. Good examples are Heritage Connect Lincoln, http://www.heritageconnectlincoln.com/ and Bristol's Know Your Place, http://www.bristol.gov.uk/page/planning-and-building-regulations/know-your-place.

Decreasing resources are also having an impact, eg in monitoring compliance with planning requirements, including conditions applied on behalf of planning authorities, particularly in relation to on-site work of contractors, the production of timely reports and publications and the appropriate deposition of archaeological archives. The last two are of particular concern as they directly relate to the provision of public benefit.

We recognise that the perceived non-statutory nature of the advisory services – although they are a key part of the NPPF which local planning authorities have to follow – has left them vulnerable to financial cuts, and the status quo is unlikely to be tenable in the future. A key positive move would be for Government to ensure a clearer statutory basis for HERs.
and the services that sustain them, as was envisaged through the Heritage Protection Bill. The CBA strongly supports moves to provide a statutory basis for archaeological advisory services and the HER, and we are encouraged that this approach is being openly discussed in Wales linked with the forthcoming Heritage Bill.

In the difficult circumstances anticipated in the future, we suggest that, where appropriate, advisory services should be aggregated together at a more regional level, with appropriate ring fenced funding provided by local planning authorities, central government (through Historic England) and developers (perhaps through the Community Infrastructure Levy). We also suggest that these regional services could bring together archaeological advisors and conservation officers in a single historic environment service. In these circumstances, Historic England should consider whether it would be feasible to deliver its own planning advice through these area advisory services, which could also include education and outreach functions potentially tied in with area research centres, supporting other specialists, for instance pottery specialists who may operate on a more commercial level. They could also provide much needed access to the physical archives of archaeological research.

The public benefits of such an approach are clear and we believe that this will result in a more coherent and consistent approach to management of the historic environment, a better resourced and managed evidence base (the HER), and importantly, a more cost effective service through amalgamation of specialisms (saving on administration and management of the HER as examples).

These options are unlikely to be appropriate (or needed) in every part of the country and existing county or shared services may continue to operate to an appropriate standard in some areas for archaeology. Historic England should be active in engaging in dialogue with local authorities, and perhaps offering targeted transitional funding support to move to new regional or sub-regional groupings where this is thought to be desirable and practical, based on the delivery of professional standards and benchmarks.

Broader collaboration

The inquiry is keen to hear how others could contribute to improving or maintaining existing levels of service.

8. In what ways could the knowledge and enthusiasm of third-sector organisations be harnessed to support the work of the present or future mix of public and private organisations in delivering your preferred model of heritage protection?

There is considerable local interest and enthusiasm for archaeology across the country. Many local societies and community groups play an active role in archaeological research,
and increasingly groups are becoming more involved in stewardship of the historic environment. The CBA will shortly be launching a Local Heritage Engagement Network (http://new.archaeologyuk.org/local-heritage-engagement-network) – funded for four years by the Esmée Fairbairn Foundation – to encourage groups and individuals to get more involved in engaging with their archaeological heritage. A key role for the Network is to encourage more groups to become advocates for local authority archaeology services – as the voice of local voters is particularly important when tough decisions about funding priorities have to be made. Local elected councillors and senior council staff are not always well informed about the key role of archaeological advisors, and third-sector organisations can play an important in spreading awareness of their value, looking out for situations where they are particularly important, eg in relation to proposed developments in areas of known archaeological sensitivity, and also supporting the expert staff through voluntary work, where appropriate.

The CBA does not believe that there is any role for third-sector organisations to replace professional specialist staff who advise local authorities, even when they have relevant skills and experience amongst their members. This is fully in line with the IfA’s policy statement on The use of volunteers and students on archaeological projects (http://www.archaeologists.net/sites/default/files/node-files/IfA-Policy-Statements-rev-Aug-13.pdf) which we fully support.

There is a role for the national amenity societies who already routinely undertake listed building casework and advise local authority conservation officers, and in some cases could expand their advice to cover other aspects of heritage protection in a cost-effective manner. The CBA has pressed English Heritage to consider delegating approval of Scheduled Monument Consent applications to local authorities, with open access to this currently closed process given to the national amenity societies and appropriate local groups. This would work well within the framework we outline in answer to question 7 above, with continuing Historic England involvement in a more open process. With appropriate additional funding, the CBA is also well-placed to expand its operations regionally and locally to facilitate increased engagement with the planning process at a more strategic level, eg to ensure that appropriate policies are included in local plans, neighbourhood plans, etc and that key archaeological sites and other heritage assets are included on local lists, as advised in the NPPF, to give them added protection.

We would welcome the opportunity to give oral evidence to the inquiry to expand on the matters referenced in this written evidence.

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13 February 2014