

Councillor Mike Jones,
Cheshire West and Chester Council,
HQ,
58 Nicholas Street,
Chester,
CH1 2NP

27th November 2014

RE: Cheshire West and Chester Archaeology Services User Consultation

Dear Cllr Jones,

We are writing to you on behalf of the Council for British Archaeology (CBA) and the Council for British Archaeology North West in response to the current consultation into the future of the Archaeological Planning Advisory Service (APAS) and Historic Environment Team (HET). We wish to stress the value of these services, underscore our support for their continued delivery, and consider ways in which they could contribute to the Council's aims in terms of sustaining and enhancing culture, heritage and communities in the future.

The CBA is the national amenity society concerned with protection of the archaeological interest in heritage assets. We have a membership of 620 heritage organisations who, together with our thousands of members, represent national and local bodies encompassing state, local government, practitioner, academic, museum and voluntary sectors. The CBA is the parent body of CBA North West, which is an independent charity funded by subscriptions of 270 members and which works to advance the study and care of the archaeological and historic environment of Cheshire, Greater Manchester, Lancashire and Merseyside.

The following statement sets out our reasons for judging the high importance of the services in question and their context in West Cheshire, and the challenges of the current financial restrictions facing the authority. We hope that the advice offered is helpful in ensuring a decision from this consultation process which adequately recognises the role and importance of the historic environment and its potential to add value to the wider activities of the Council, at a reasonable cost.

1. The value of archaeology services

The historic environment is a core part of the planning process and features prominently in the National Planning Policy Framework as one of the twelve core principles (2012: para. 17). As part of this, archaeology services are vital for the delivery of sustainable development through planning, performing

multiple beneficial functions: (1) They assess development proposals for potential impacts upon the historic environment, providing advice on the significance of historic environment assets and on how that significance can be better revealed or enhanced; (2) they conduct investigations to increase knowledge and understanding of the past; and (3) they design mitigation strategies which protect heritage whilst also minimising the risk of unforeseen cost and delays for developers.

In addition archaeology has many broader social and economic functions which strong local historic environment services are able to capitalise on, delivering benefits to the public, the council and developers. It can also help to further the aims of the council to create a healthy and vibrant city through both understanding and celebrating its past but is also helping to define present and future direction. These benefits include, but are not limited to, education and knowledge gained from understanding the past, sense of place and belonging, economic contribution in terms of tourism and of local amenity, and consequent economic benefits in driving regeneration, as well as promoting social goods such as inclusion of diverse cultures in local life and the furthering of localist aims for civic empowerment. The CBA would gladly provide evidence to support these claims if so desired by the council.

In order to achieve this a local archaeology service must maintain or have access to a comprehensive, publically accessible and regularly updated Historic Environment Record (HER). This obligation is defined within the National Planning Policy Framework. It must also have adequate advice capacity to undertake development control work, advise on the implementation of national planning policy and guidance, and engage with the wider public and voluntary and third sector interest in archaeology through community outreach and education, project work and wider collaboration with wider council specialists such as those involved with planning, regeneration and the environment.

2. The stated importance of the historic environment in West Cheshire

It is clear from the policy and guidance produced by CWaC that the historic environment is seen as being of the highest importance to the council in terms of cultural and economic value. The Chester 'One City Plan' is up-front about its deep commitment to the importance of the historic environment. The Plan recognises that the historic environment is what makes Chester distinctive (p.4), and defines sense of place (p. 19. 36. 38). It states that surviving archaeology and architecture 'underpin[s] the city's character' and is deemed to play a role in driving the success and growth of the city and 'should include newly discovered archaeology as part of development schemes' (p.38). Thus, it should be 'respected' and 'celebrated', and used to 'encourage developments of the highest quality' (p.28). The plan also asserts the importance of the impact of planning and development on local communities (p.19). In addition, heritage is an important driver for tourism and generates substantial income for the city.

The CBA considers that for all of the above positive rhetoric, CWaC could be doing much more to create a joined-up approach to maintaining and managing the historic environment in a way which fulfils the potential to deliver a positive and sustainable economic and social strategy. In order for the stated benefits of heritage to be consistently upheld and pursued across the council, the historic environment services need to be well enough resourced and sufficiently connected to create and sustain a proportionate range of services and engagement with people of west Cheshire. For example, if the historic buildings and archaeological remains of the city and district are a key driver for tourism, then a proportionate investment in their management and upkeep in a manner which befits their economic and social value must be in place. Without this, the conclusions of the recently produced Black Radley *Cultural Strategy* which suggested that culture in Chester (of which the historic environment is a part) is in decline (p.7) must be held to be true and could have significant impacts upon the quality of the historic environment in the district.

We wish to emphasise that these services should be at the heart of the Council's efforts to deliver on its local plan pledges on the value of heritage in Cheshire West and Chester, working alongside staff working within planning, urban design, regeneration and other areas. Considering this importance we believe that a proportionate amount of resource for the services which support these functions is reasonable and necessary.

3. *The current context in Cheshire West and Chester*

At present APAS and HET provide a basis for the necessary archaeological work which is described above and for the delivery of CWaC's high ambitions for the historic environment in the borough. Without these services maintained to an appropriate level it would not be reasonable to think that the historic environment could genuinely 'play a driving role in Chester's future success and growth' (One City Plan p.38).

Currently, the CBA is concerned that previous cuts to both services have left them with a substantially reduced capacity. It is also concerned that HET will be expected to be self-financing by 2017, which we interpret will rely to a large degree on external contract work which will come at the expense of local service capacity.

In addition, previous cuts which have had the effect of losing or substantially reducing the hours of the most experienced members of staff, are posing a significant problem in terms of succession planning for the skills and expertise necessary to maintain the intimate local archaeological knowledge required to ensure efficiency and accuracy in many cases.

Proposals to deliver the 'Chester Renaissance' regeneration project will require significant input from the HET, and if the City wishes to pursue designation as the European Capital of Culture the way in which city deals with its heritage will be scrutinized not only for the ability to adequately protect historic environment assets, but also to present them at the heart of the tourism offer and local everyday life. To think that ambitious projects like these could be carried out with an inferior historic environment and archaeology provision is unrealistic at best and deeply disingenuous at worst.

However, the CBA is in no doubt that the changing structures and economic realities facing local authorities mean that change to the way these services are delivered is inevitable. Nonetheless, we believe that it is possible to at once recognise the importance of archaeology and the historic environment and engage in realistic discussions about how those services will be made sustainable and proportionate to their significance.

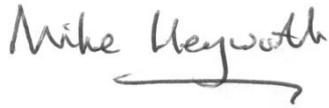
A proviso to this assertion is that these services are treated for how important they are as contributors to the planning process and to the wider value of heritage in West Cheshire. They must not be viewed as a 'soft target' due to their lack of a statutory footing or for any other reason.

We are encouraged that CWaC are engaging in a thorough and open process to investigate the best option for the delivery of these services. This is an opportunity to innovate, to explore new models and new methods of achieving benefits as a result of these services. Provided that they are well planned and backed up with sufficient resource and political will there is no reason that the CBA knows of why a number of different models for delivery could not be successful.

We wish to note that opportunities exist to consider the role and function of the voluntary sector in delivering elements of added value to core development control services. There is a wealth of enthusiasm among the public for the historic environment and local societies may have the potential and willingness to be a bigger part of how the historic environment is conserved and enjoyed locally. Whilst voluntary capacity can never replace local authority resource or specialist expertise, they can offer infrastructure to deliver local engagement and public benefit, and we would welcome discussion of how this could help in Cheshire West and Cheshire.

We hope that whatever model is decided upon, it will be appropriate to the level of cultural and economic importance that the authority attaches to the historic environment and that the services will continue to be a contributing factor to the vibrancy of Chester's historic environment.

Yours sincerely,



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Below are the answers given to the specific consultation questions provided at <http://www.cheshirearchaeology.org.uk/?p=1638>:

6. What do you particularly value about the services you receive?

In broad terms, the CBA values the contribution that the existing services make to the planning system; their potential to deliver benefits to a wider civic population; and to contribute to the authority's goals to improve the tourism offer, urban development and regeneration, sense of place and community, and localism aims in Chester and the wider authority area. To this end we value the adequately resourced service and qualified expert staff who are able to deliver results to a high standard and level proportionate to the significance of the historic environment.

Without the services offered by APAS, CWaC and the other users of the service within the development process would not be able to meet demands on them to deliver sustainable development as defined in national planning policy. The NPPF states; "Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life" (Para. 9), and that "Local planning authorities should have up-to-date evidence about the historic environment in their area and use it to assess the significance of heritage assets and the contribution they make to their environment. They should also use it to predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future. Local planning authorities should either maintain or have access to a historic environment record." (NPPF para. 169).

CWaC's service has for years been seen as one which has a good reputation for quality of service and has been an exemplar in providing a shared service across multiple districts which has been resilient under pressure and consistently reported as being well-liked by the stakeholders that we have spoken with. Previous losses of experienced staff due to redundancies and non-replacement of retirees has caused strain

to the service which we feel would be under threat of losing this good reputation if further expertise was lost.

The HET also provides a valuable service in Chester, and have had a highly important role in the development of Chester's visitor attractions and tourist destination status over the lifetime of the service. Given Chester's ambitions for future development in this area, we judge the continued existence of HET to be important. Indeed closer working with other Council services across the areas of built environment, regeneration, planning, business growth and tourism would all seem necessary if Chester wishes to pursue accolades such as the European Capital of Culture or projects such as 'Chester Renaissance'. HET's activities will likely be vital in this respect.

7. What could be improved upon or added to these services?

Whilst the CBA does not wish to comment on matters of detailed improvements which we will leave to be answered by our members who use the service personally, we would like to offer some general comments on the shape and function of the services.

We do not underestimate the scale of the challenge of reforming the services as they stand, but we feel that possibilities exist for improving and adding to them. These options should be thoroughly investigated for the potential benefits they may yield. For example, it may be beneficial to seek to expand the APAS service to cover a greater geographical area utilising service level agreements with additional neighbouring authorities. Alternately options to expand and develop the range of activities in order to integrate revenue raising streams into the existing service could offer ways to increase sustainability without damaging capacity in core areas and allow the retention of highly experienced staff whose loss would damage the overall service.

These are just two examples among potentially many more which we hope that CWaC will be considering with the aim of protecting the functions of the services. As a general rule we would support innovative proposals that diversify the services in order to protect capacity, rather than continuing with a salami slice approach to cuts which will erode the services' reputation and eventually lead to them becoming unviable.

8. If these services were not provided by the council, where would you obtain them?

Without a council run system for historic environment services in place there would be significant problems for stakeholders across the board. Planning advice services are vitally performed by the Council with impartiality and with the potential for significant earned income, whilst private advice could be obtained from consultants, it is unlikely that without conditions placed by qualified archaeologists within the council

that private services would be regularly contracted by developers, leading to expense and delays should archaeology be discovered later, or the loss of potentially nationally significant archaeology as yet undiscovered. Planners within the council are generally not suitable to deliver specialist archaeological assessment or maintain HERs.

In terms of the HET, external consultants may be available to deliver project work in some of the areas currently delivered by HET. However, close working with the Council gives HET a privileged position in relation to other council services which is beneficial to the sharing of knowledge and achievement of a joined-up approach to civic management. For outside users of the HET service, there would be no obvious alternative at a local level for advice relating to heritage work.

11. How would you like to see the APAS services provided in the future?

Whilst the CBA have no overriding preference to how these services are delivered, so long as they are delivered to an acceptable standard and sustainably managed, the most positively evidenced system is one delivered by local authorities. A positively focussed local authority led system has the greatest ability to contribute to joined-up working within the authority and therefore positively influence the wider authorities work. It can also engage in revenue raising practices and outreach.

There is some evidence and good guidance to support the development of sub-regional shared services which is worth considering as an option for developing a resilient and sustainable system. Whilst some concern about local expertise being located locally may be encountered, the CBA believes that a system which is well founded upon a sub-regional model of delivery could be advantageous for overcoming current financial difficulties. Larger shared services, by and large, should be able to operate a resilient structure, deliver a greater range of activities, and employ a greater range of staff skills, retaining expertise and giving opportunities to train and develop those staff in larger teams. A strong and well-resourced service could provide services to neighbouring authorities at a significant overall saving, with service level agreements able to deliver proportional cost savings along with greater ability to deliver a broader service capable of greater public benefits.

In addition to the three present partners the CBA would support opening discussions with further neighbouring authorities, particularly the Wirral and Merseyside, with the aim of expanding the shared service agreement into a sub-regional one. This is felt to provide options for benefits for all stakeholders.

Charging systems are a useful way to gain income to support wider services. Many authorities operate a system of pre-application advice charges and this should be investigated by CWaC to assess what level and structure for charges could be adopted. Charges may also be deemed appropriate in some form for the accessing of the HER by some developers, although should be free for members of the public. A pro-active

section 106 agreement written into local plans which channelled money to archaeological services could also provide financial security for services.

External project partners could similarly provide a level of service delivery at a reduced cost or with off-set benefits in other areas, such as in education, training or voluntary engagement if allied with a university partner, or greater commercial options if allied with a commercial partner. However, each of these approaches has limitations and consequent downsides, such as isolating the service from wider council functions, possibly leading to a loss of influence and joined-up working, or a perceived loss of neutrality.

In addition to commercial or academic partners, the CBA is keen to point to the variety of voluntary stakeholders in the historic environment in West Cheshire who may be willing partners in the delivery of a re-envisioned service with added public value. There is a wealth of voluntary expertise in local archaeological, historical and civic societies which could be valuable. Whilst voluntary provision can never replace the core responsibility for the service's functions, we urge CWaC to consider developing these partnerships as a way to potentially deliver greater value from historic environment services and at a reasonable cost to facilitate.

Out-sourcing services entirely to third-parties is a high risk proposal which is entirely dependent upon the quality of the tendering organisation and the manner in which oversight by and working relationship with the authority is maintained. There are several examples of out-sourced services which have varying levels of success. Good services such as the Greater Manchester Archaeological Advice Service (GMAAS), hosted by the University of Salford, have provided a diverse and rich set of benefits to the public through innovative delivery models, albeit that recent cuts have drastically reduced the capacity of the service to do this. If outsourcing was pursued the CBA would advise putting in place a lengthy contract for delivery, a solid framework for working between the councils and the delivery body, a detailed codified understanding of expected levels of service, and sufficient resource to maintain a proportionate system. Recent tenders to outsource some services in Inverclyde were unsuccessful due to the untenable financial support offered by the authority and other out-sourced services (such as West of Scotland Archaeology Service and Tees Archaeology) have proved constantly at risk of disproportionate cuts or complete withdrawal by authorities. Even quality services like GMAAS have been endangered due to short term contracts and high degrees of cuts. Any chosen external body should be carefully assessed for the necessary expertise and capacity and skills to deliver services, not only relating to core functions, but also to profile accessibility, and added value functions, such as offering opportunities to engage with the education system and with voluntary groups.

Splitting the existing system to be run by single authorities is the proposal which the CBA would regard with the greatest risk, as it is estimated that there would be significant costs required to facilitate the re-establishment of services in Warrington and Halton and Cheshire East where the infrastructure currently does not exist. We would be worried that doing this would lead to the complete loss of archaeological

services in these regions. Additionally, this option would be likely to lead to the loss of economies of scale and to a lower level of staff resilience and opportunities for training and succession planning.

As stated above the CBA does not believe that any one model is necessarily the best. It is judged that any of the above options *could* provide a potential delivery model, provided that the underlying aims are to ensure a sustainable, resilient service with the capacity to fulfil the functions required of national policy and meet the standards that the Council's own vision sets.

Again, it is possible that a combined service could yield benefits in service stability or cost savings. However, different geographical areas of operation and substantially different skill sets among staff are factors that are likely to limit effectiveness in this regard.

If the HET was to become self-funding by 2017, this may also present a confusion of purposes for the APAS side, where earned income would likely be a supplement for centrally funded develop control work. There would have to be de facto separation if the planning advice and development control work was to be protected from a failure to meet HET's income generation targets.

It is possible that some benefits in terms of economies of scale could be achieved through merging ancillary service requirements, but the main expertise and areas of operation of the two teams is likely to remain significantly distinct. It may be that a merger would offer the potential for HET to expand its area of operation to the wider county level or beyond, although this is not precluded by any of the proposed options. Another factor, as stated above, is that any attempt to seek public sector partners for services is likely to require a distinct approach for APAS and HET, with each likely to be found in different areas. As such a merged service may have a harder time to find suitable partners.

13. Have you any other comments you wish to make about these services, or about this review?

As a general comment the CBA would like to offer reflection upon the scale and nature of the consultation process being undertaken by CWaC. We recognise the great pressures currently facing authorities across the country and understand that difficult decisions have to be made in order to secure viable services across the range of vital functions of local government.

We appreciate the open consideration of options that this consultation represents and hope that the Council are willing to invest time in the necessary research to come to the best answer; both in terms of how to save money and how to deliver the best services. We would like to highlight the commitment made by English Heritage in the Historic England Corporate Plan, which commits the organisation to helping local authorities transition support services into new working arrangements. We propose to CWaC that a positive engagement at this stage with English Heritage could see some support for a quality investigation process which could be of help in guiding authorities who will be facing these challenges in the future. In

In addition, the CBA would be pleased to offer support in helping to develop ways in which wider voluntary engagement with the services could be facilitated, particularly with the aim of adding value to core services delivered by the Council.