

The future of local government archaeology services:

An Inquiry for the Minister for Culture, Communications and Creative Industries, led by John Howell MP and Lord Redesdale and supported by The Archaeology Forum.

Call for written evidence

In response to issues raised by representatives of the archaeological sector at an event organised by the Archaeology Forum in October 2013, the Minister for Culture, Communications and the Creative Industries, Ed Vaizey, initiated a review to be undertaken by Lord Redesdale and John Howell MP into the future of local government archaeological services.

These services have traditionally played a key role in the identification, protection, conservation and investigation of England's rich archaeological heritage – including sites of undisputed international or national importance. In addition they also provide the backdrop for the nation's long tradition of public involvement with archaeology.

The review wishes to identify sustainable ways of improving or maintaining the provision of these services, recognising that government funding is unlikely to be increased in the short or medium term.

The inquiry wishes to engage the following themes:

- The consideration of options for improving the sustainability of local services providing (i) curatorial advice, and (ii) HERs & archaeological archives, drawing on best practice from local authorities in England and elsewhere in the UK;*
- Whether the knowledge and enthusiasm of third sector organisations could be harnessed to help supplement public involvement in archaeology;*
- The consideration of (i) how the impending creation of Historic England could provide opportunities to forge closer links between local services and their national counterparts, and (ii) if current sector-produced standards and guidance provide the necessary rigour to underpin such a diversity of provision.*

*As we move to achieve these goals, evidence would be welcomed on the following eight questions by the deadline of **14th February 2014**:*

A response by Rescue, the British Archaeological Trust

The existing models for local government archaeology services

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

Yes, in the last decade there was a period of several years when Northamptonshire lacked any advice. Recently Merseyside, Sandwell in the West Midlands, Middlesbrough and Redcar & Cleveland in Teeside, have been reduced to no provision. Many authorities have reduced staff so that there will certainly be inadequate provision when development

expands and there may already be; a steady drop in overall staff numbers is evidenced in the briefing paper.

There is also a severe deficit in provision for archive storage – little progress has been achieved on the establishment of regional centres (with the exception of the exemplary LAARC) to compensate for the lack of appropriate resources and interest in the museum sector, now exacerbated by very common resource cuts in the local authority museum sector. There is a serious risk that the end product of the entire process is being damaged or destroyed; it is certainly not providing the educational resource that it should. Nor is it adequately fulfilling the requirement to ‘preserve by record’ those sites that have to be excavated in advance of development and cannot be preserved ‘in situ’. The existence of a full and comprehensive physical archive is essential to back up the paper and digital records

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

Almost every local authority regularly considers this option when planning budget cuts – a current example is Chester West and Cheshire Council. Until the provision of a Historic Environment Record and archaeological advice is made a statutory responsibility of local authorities this will continue.

- *What trends have you identified?*

Urban authorities have been particularly vulnerable to archaeological cuts in recent years and non-statutory services are the first to be cut when budget cuts are needed. Rescue has frequently responded to threats of staff reductions by local authorities, both on the advice and HER side and in museums which should be the final repository for archaeological archives and an outlet for the knowledge gained in the process.

Please give examples where possible.

Southampton has cut Heritage posts from 5 to 1

Portsmouth has been without any full time archaeological advice since about 2005 and has been without a full-time Conservation Officer since last year.

South Yorkshire Archaeology Service – one staff member (SMR enhancement) cut and post lost

- *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 these will and do result, but identifying and quantifying the loss of archaeological sites, which is the key element, is near impossible. Developers are extremely unlikely to report any chance discovery during construction except perhaps for human skeletal remains which are covered by a legal obligation. While the majority of developers remain convinced that the current archaeological process will cause unnecessary cost and delay (an attitude fostered by the media and sometimes by government) it is hard for them to recognise the reality that it is far more common for these problems to be the result of bad advice from consultants and inadequate investment at an early stage.

The gradual paring down of the local authority sector is certainly impacting on participation opportunities – here is a simple example “Following the announcement of savings to be made by the County Council, Worcestershire Archive and Archaeology Service has reviewed its opening hours. The HER opening hours changed from Monday 13th January 2014 to Monday-Friday 13:00-16:00 and Saturday 10:30-13:30, and the opening hours for the Original Archives will change as of Monday 3rd February 2014” of the kind of reduction of local access by an organisation with a good reputation for direct work with the public as well as innovative online systems.

South Yorks Arch Service – has established a principle of ‘no excavation on Council owned land unless directly threatened by development’ (i.e only commercial archaeology is permitted; no access or opportunity for local am/vol groups, even if HLF funded)

Rescue has long campaigned about the devastating impacts of agriculture on nationally and regionally important archaeological sites, both those protected by scheduling and those that are not. Some progress has been made with DEFRA grants for the reduction or cessation of ploughing on significant sites but the schemes have been cut back, their future is uncertain and most schemes are time-limited. Advice on agricultural and woodland schemes has almost certainly also declined because of the more immediate demands of planning applications and the nature of the impact being less apparent. Rescue does not currently have access to the figures for historic environment agricultural grants nationally but believes that they have sharply diminished.

Alternative models for providing planning advice

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

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

Rescue strongly believes that archaeological advice must be, and must be seen to be, impartial and seated within the public sector. The only long-lived alternative system within the UK is a system of Trusts in Wales, which was always designed for the very specific circumstances of that country and is regarded as not representing best practice because of the potential for conflict of interest between advice and commercial practice. There have been issues over the years resulting from the detachment of the Welsh Trusts from the planning advice system and the local community, particularly in urban contexts.

Rescue is concerned about current proposals to outsource the HER and historic environment advice in Somerset to a charitable trust; as the primary functions of the trust apparently relate to museums and archives (the historic environment role was actually initially omitted from the advert for new trustees) the non-statutory HER and advice role may be very vulnerable to financial pressure in future. The increased organisational divide between advice and planning practice is likely to reduce the effectiveness of the advice to the detriment of the archaeology; the removal of the role from democratic scrutiny is bad not least for the public perception of the process.

Past attempts, for example in Berkshire, to site such services in the private sector have proved largely unsuccessful. Rescue believes that there are already severe problems with the unclear separation between commercial advisors and contract archaeological companies. The need for professional monitoring of the activities of any private sector advice and HER provision should make it unattractive financially to a local authority. Although strenuous efforts are currently being made by local authorities to charge for archaeological advice and HER access by commercial companies this is publicly funded data and expertise which must therefore be freely accessible to the public, and could not possibly legitimately return a commercial profit while achieving their primary functions.

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

Rescue believes that the small successor Historic England body is unlikely to be able to work any more effectively than the current, much reduced, English Heritage. EH and any successor should be pressing at the highest levels for statutory status for HERs and advisory services. So far however they have failed even to get Conservation Officer provision made a statutory obligation despite the more visible heritage responsibility for buildings. All programmes for improving the quality and quantity of the list of scheduled monuments ceased some time ago and registered parks and gardens and battlefields remain vulnerable to commercial development – these must be the starting point for the national heritage protection role.

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

Rescue believes that current maritime heritage protection is less effective than that on land. There needs to be equivalent measures and practice; this is an area where EH potentially has the expertise to contribute to practice at a local level.

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

No, the current standards are largely based on a minimum acceptable level that has created an unacceptably low benchmark for professionalism and quality of work – demonstrated by the fact that almost no archaeological organisation is ever penalised for low standards. While fieldwork is bid for almost entirely on the basis of cost this results in disadvantage for those striving to work to a high professional standard. The lack of good standards means that the local authority advisors are constantly working at local level to ensure acceptable methods of excavation and recording are being observed but are being forced to accept shoddy work carried out by organisations that prove inadequate for the task.

Rescue has also observed that there are apparently very different requirements on similar developments in different parts of the country – research and better informed standards are needed to take our heritage out of a postcode lottery while recognising the very real regional variations in the character of the historic environment.

Your recommendation

- *What would be your preferred model for the provision of archaeological advice?*
 - *Is your preference for continuation of the status quo?*

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

Rescue believes that the current model of locating independent curatorial staff and the Historic Environment Record within local authorities at an appropriate level for providing planning advice is one that should be underpinned by statute. When properly supported this system delivers an economic service that minimises undue influence or intervention by the developer or political pressure, while professionally scrutinising and mitigating the impact of planning and development, applying appropriate planning conditions and ensuring the proper recording and dissemination of archaeological data. At the same time the maintenance of the HER and the professional expertise of staff provides a valuable local resource of up to date knowledge for use in advice, display and research in many contexts. Failings in the current model of provision are due to uneven and inadequate local resourcing rather than problems with the model itself, and are very unlikely to be resolved by alternative systems. Where a local authority is committed to providing an archaeological advice service the result is the identification, protection, enhancement, investigation and promotion of the archaeology of the area for the benefit of present and future generations.

Broader collaboration

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

- *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?*

Rescue does not believe that heritage protection should be delivered by ‘a mix of public and private organisations’. Heritage protection requires a high level of professional knowledge and skills to deliver a complex public service. The knowledge and enthusiasm of voluntary organisations is very welcome in contributing for example new data to the HER by survey, research or excavation when carried out to professional standards with appropriate guidance. They can also usefully monitor and make public individual failings of the protection system on the ground, but our experience is that in general the public have little desire to devote their effort to understanding the complexities of professional heritage protection.

HOW TO RESPOND

Please send your response to taf@archaeologists.net by **14 February 2014**.

Please limit your response to roughly 2000 words. You may include web-links to factual supporting data and evidence, and where such evidence is not available on line you may append it.