



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

Standard and guidance consultation
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Dear Sirs

**CONSULTATION ON THE IFA STANDARD AND GUIDANCE FOR ARCHAEOLOGICAL
ADVICE BY HISTORIC ENVIRONMENT SERVICES**

The Institute of Historic Building Conservation (IHBC) is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

Thank you for inviting us to participate in this consultation. We very much support the IfA's initiative in preparing the Standard but have some concerns that it fails to recognize the contributions to HE made by professions other than archaeology and feel that the text should be reviewed to reflect this.

As our concerns do not fit comfortably into the format of the Questions posed in the Consultation we have attached them to the fairly general Question 1 as set out below.

We hope our comments are helpful.

Yours faithfully

James Caird
Consultant Consultations Co-ordinator

1. How well does the draft Standard and guidance meet the aims as stated above? How could it be improved?

- 1.1 The commendable aspects of the Standard are undermined by a small number of serious flaws. As there is no definition of archaeology, the understanding – and application - of 'archaeological advice' is confusing. While the definition of archaeological advice specifies a focus on significance in the first instance, the adoption of the term 'stewardship' introduces a wide range of other skills at levels that are ambiguous and indeterminate, especially in the context of historic environment services.
- 1.2 Terminology is often a problem. We would encourage the observation and operation of the definition of archaeology proposed at the outset of the Southport report as starting point for any re-drafts:

'Archaeology is the study of the physical evidence of the human past, whether built, buried or underwater, ranging from investigations of landscape through settlements, structures and features to artefacts and biological remains.'

- 1.3 The application of that definition across the Standard would go a long way towards addressing the ambiguities and confusions that the standard would certainly generate in its current form. As noted by the IHBC in the unfinished discussions that took place during the development of the project, this approach would facilitate recognition of the Standard outside archaeology circles.
- 1.4 As a consequence of the lack of clarity in the terminology, the guidance does not distinguish effectively between the provision of archaeological advice (which is subject to the Standard) and the variety of other activities involved with the understanding, appreciation, communication and, most important to the IHBC, conservation of the historic environment.
- 1.5 The failure to distinguish between these various activities is compounded in the details of the Guidance. It gives the impression that archaeological advice is, somehow, the part of conservation advice that conservation officers do not provide because they are preoccupied with designated fabric and areas.
- 1.6 In fact the skills for conservation are underpinned by international and national standards, and are successfully overlapped with, or sit within, many disciplines. They often have only limited overlap with the priorities of an archaeology service. This Standard could begin to address the confusion currently generated by the text by highlighting the appropriate skills expected when offering conservation advice. For the purposes of the guidance these are most easily defined by the entry criteria for the IHBC and the substantial national and international standards and practice that support them, including the ICOMOS guidance on training referred to below, and BS 7913, both currently under review.
- 1.7 The confusion the Guidance generates over the boundaries between conservation and archaeological advice is particularly inappropriate where the guidance actively promotes the 'Registered organisations' affiliated to the IfA. The Standard fails to meet its own aim to be impartial, or 'independent of any contractual or other potentially conflicting interest.'

- 1.8 The Standard as currently written could be interpreted as subsuming within archaeological advice all professional activities for surveying, assessing, promoting and caring for the undesignated historic environment. The promotion of the IfA's registered organisations within this could imply that membership of the IfA's corporate listing would be required for historians to establish history, surveyors and architects to record fabric or assess design quality, heritage and community officers to promote the historic environment, and conservation specialists to conserve the historic environment, and, indeed, planners to plan.
- 1.9 The range of sources appears to be neither consistent nor complete, though that may reflect the status of the draft. It includes only one international charter under the UK references, and fails to register the 1993 ICOMOS 'Guidelines for education and training in ... conservation...'. This document is the most recognised skills framework for those working with undesignated historic fabric and areas. This omission is especially unfortunate as UK built environment professional bodies covering more than 200,000 memberships use this as the common platform for assessing competence in dealing with change in the historic environment. Its omission may reflect concerns over the inter-connection with conservation, making it more unfortunate that the IHBC's reservations in this area could not be addressed in discussions over the development of the Standard.
- 1.10 However, along with these omissions, reference is also made, to underpin other parts of the guidance, to the Southport Group report. We believe this report has no public status other than as a record of discussions and recommendations. Unfortunately the recommendations made by the IHBC as part of the Southport consultation do not appear have been incorporated in that final record.
- 1.11 A review of the content, rationale, quality and purpose of the list of references is a key challenge for the future.
- 1.12 Proportionality and balance in the approach to information content in records is crucial. While the specification of what such information might be is still being developed - with substantial investment from English Heritage assisting progress - a sensible default would be for every HER to make a statement about the potential inadequacies of their records for conservation, planning or other purposes. We can particularly endorse the stipulation that:
- 'The term HER implies the inclusion of adequate information on all aspects of the historic environment. Where this is not the case, this must be clearly stated in published guidance or advice notes. ' (p7)*
- 1.13 The IHBC can only urge continued progress in the development of a viable and recognised base line of information content. Allied to that should be the promotion of complementary information that will ease pressure on the HERs to be all things to all, such as the Heritage Gateway and the development of an on-line database out of the legacy of Sir Howard Colvin.
- 1.14 The bias the document displays towards England's recent policy developments should be guarded against.

2. Are our expectations of what historic environment services should do too high, too low or about right?

We are not keen on the expression "Advisors *must* ... encourage the creation of local lists...". Many archaeological advisors are at County level whereas local listing is a District matter. An added complication is that there is a wide range of political attitudes to local lists on from authority to authority. We think the matter should be one of local judgement for the individual advisor.

3. Do the Standard and the principles of the guidance adequately apply to advice given by national organisations, as well as to that given to and on behalf of local planning authorities? If not, what else is needed?

Please see our comments at Question 1 above.

4. Are the 'Aims of advice' (as described in Section 2 of the guidance) correct?

We suggest there should not be an aim of securing economic benefits. If this is retained it should be explained/justified. Whilst economic benefits may well be desirable, where possible and appropriate, IHBC considers they should not be listed as an aim.

5. Have we used the terms 'must', 'should' and 'may' correctly in order to make clear the level of obligation imposed by the Standard and guidance? If not, where should changes be made?

The IHBC is concerned that the Standard may impose a standard for elements which are subject to local political and budgetary control. These expressions should be reviewed carefully to ensure that each and every use is realistically achievable.

6. The Standard and guidance refers to current planning guidance and will be updated as that changes (potentially within months for England and Wales). Is the document otherwise sufficiently future proofed?

It would be worth adding a reference to a possible Scottish national HER standard which may emerge soon. Also where English or Scottish etc. policy or guidance is quoted the full reference and highlighting where it applies should be given.

7. How well does the draft Standard and guidance address the visions and recommendations of the Southport Group (www.archaeologists.net/southport)? What should be added?

Please see our comments at Question 1 above.

8. Does the draft Standard and guidance deal adequately with sensitive or contentious issues where guidance is needed by the sector? What have we missed?

Please see our comments at Question 1 above.

9. Have we defined all the terms that need to be defined?

Add " Grey literature" (6.2)

10. Can you provide any case studies to illustrate the sort of good practices advocated in the guidance for the online Good Practice Guide?

Conclusion

There is a concern that the standard will be reviewed by a narrow range of specialist archaeologists all working in associated fields, while at the same time seeking to impose itself far beyond that group. The IHBC's response to Southport Report encouraged consolidation within the archaeology sector. Such a broader sectoral plan would help wider engagement with this highly specialised sector, and only help in the development of the current standard into an effective document suitable for adoption by a much more diverse range of historic environment interests.

The underlying causes for the concerns raised here were identified in the IHBC's response to the first draft of the Southport Group report, and addressing them remains the key to the successful progress of the standard.

Should these matters be addressed we consider that the standard might well progress to a successful second consultation.

IHBC, February 2012