

INSITUTE OF HISTORIC BUILDING CONSERVATION

All-Party Parliamentary Archaeology Group

The future of local government archaeology services

The IHBC welcomes the current discussion of archaeology advice and provision. Archaeological provision is not simply a stand-alone service but critical to the delivery of both statutory and non-statutory conservation services within the planning system. Through the planning process, effective access to archaeological information and research are an essential tool underpinning sustainable development and feeding into conservation skills-sets which are increasingly recognised as the platform for mediating between the cultural legacy and the pressures arising from the promotion of sustainable growth. The Penfold Review in England specified particularly the value of IHBC membership criteria and skills-sets in its recommendations on the management of growth, while the National Planning Policy Framework (NPPF) requires that local authorities need to 'conserve [heritage assets] in a manner appropriate to their significance'. (paragraph 126)

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?

Archaeological input to conservation outcomes includes not only formal advice but, through Historic Environment Records (HERs) in particular, access to archaeological information. Ready access to relevant information is recognised as a central plank of planning for sustainable development through conservation as required by statute and the NPPF. Access to the digital records in HERs are essential to inform conservation processes across both public and private sectors.

The IHBC has had a long-standing role in advocating and supporting more wide-ranging content and dataset availability through HERs and HER-related resources such as the Heritage Gateway. It regards achievement of an agreed base-line of such information as an essential step forward in any progress towards statutory HERs.

Access to suitable levels of specialist archaeological advice to help support planning processes is equally important.

However in both cases lack of investment, and the impact of cutbacks, have seriously impaired access to information and advice and progress in achieving the necessary standards. The problem of such cutbacks is also reflected in conservation services. There is no doubt that achieving satisfactory operation and 'acceptable professional standards' has been compromised by changes.

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

Measures of the actual scale of archaeology infrastructure and conservation services have been carried out in England since 2006. These have shown a substantial downward spiral from a point that was even then recognised for its limitations. At this stage the infrastructure of conservation is critical, and we have no reason to believe that the situation is otherwise for archaeology.

The IHBC has been annually surveying building conservation services within local authorities since 2006. The results have been published in the 2013 Annual Report on Local Authority Staff Resources, in partnership between the IHBC, English Heritage, and the Association of Local Government Archaeological Officers (ALGAO). As such the conclusions cover annual surveys of the levels of expert advice available for both conservation and archaeology within local authorities.

In 2012 the number of conservation specialists in English councils fell by 4% and this in turn contributed to the devastating 33% cut since 2006.

This massive loss in conservation knowledge and specialist advice equates to the reduction of one in three conservation officer posts in local government, threatening the proper care of heritage as well as the huge investment of public monies into England's historic environment by bodies such as the Heritage Lottery Fund.

Many of the losses are the result of short-term decisions and hasty axing of conservation services as 'unaffordable' or 'non critical'. The crisis point has been reached at which local authorities are becoming unable to cope with their statutory workload and which has direct consequences for their customers and the community.

The studies by ALGAO into archaeology capacity offer the most precise statement of current levels of service and, clearly, would best inform the question. Evidently, as with conservations services, the relative absence of specialist resources is a useful heuristic for uninformed or inadequate services, and as such the ALGAO research, suitably updated, would be the best source for answers to this question.

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

See above

c. What trends have you identified?

See above.

The more remotely advice is provided the more there may be tendency to place conditions requiring investigation, site evaluation, trial trenches etc. to ensure that nothing is missed. If the advice is local, the archaeologist knows the area and the areas of archaeological potential and can advise accordingly. The development process can proceed without the need to carry out additional extensive work to ascertain something that a locally based archaeologist could already know.

2. What are the consequences of inadequate provision of archaeological advice to local authorities?

See above.

As noted also, archaeology services in local authorities are crucial to successful of the planning outcomes, and ready access to such services, operating at a level commensurate with the archaeological resource is essential for conservation services or their equivalent to inform sustainable planning and carry out their statutory and related non-statutory duties.

Inadequacies in conservation also impact further on all areas of planning services. Local authorities are responsible, through the planning system, for making decisions on how places change and how heritage is protected and developed as part of that process. When a local authority does not have access to that advice,

or that advice is stretched, then decisions are made that put local heritage at risk, the planning process can be slowed down and decisions are taken without the full understanding of their implications.

Investment in planning for conservation services and archaeological information, advice and provision supporting them, is vital to deliver the effective planning outcomes. This is formally expressed in the National Planning Policy Framework (NPPF) which requires local authorities to “identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise,” (paragraph 129) and “heritage assets assessed using appropriate expertise where necessary” (paragraph 128). Without access to such expertise the significance and impact of proposals cannot be confidently assessed. Without informed professional input there is a danger not just of genuine assets being lost or damaged but without the ability to differentiate legitimate issues and concerns of less important sites or structures being awarded more protection than may be necessary.

Alternative models for providing planning advice

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?

Strategies in conservation may offer some models for consideration in archaeology. Historically, conservation services have been closely and beneficially integrated with (and indeed grown out of) local planning services. One of the major cost-savings for conservation under these arrangements derives from the close ties and synergies between conservation activities and planning resources. For examples the value of such integrated services have been highlighted recently in the IHBC’s research into conservation in Scotland, where as little as 0.5% of the planning budget is spent on specialist conservation advice in local planning authorities. Furthermore, it is significant that an uplift of as little as 0.1% of the budget has been suggested as a way to make a ‘significant’ improvement in the services.

The value of the integration of conservation with planning delivery was also highlighted in the DCMS-sponsored Atkins survey of 2006. Indeed this last highlighted that that there was ‘no widespread appetite among senior officers or council members, within district or unitary authorities, for the sub-regional

pooling of resources along the lines of the county-based HES [Historic Environment Service]' (p.23), then under consideration, a position that seems to capture well the perceived value of local conservation delivery with in local planning services.

The reasons for such close ties are clear. Evidently the formal planning legislation within which conservation sits offers the obvious starting point. Operationally, too, the synergies are substantial. Whilst maintaining cross boundary relations and communications through regular meetings and discussion are important to consistency and support in conservation services, the local element of delivering these services is absolutely crucial. Conservation services have a more direct engagement with owners and developers throughout the application process and indeed outside the process. It is a more geographically direct relationship with individual property owners based on more local boundaries. Proactive locally based action and geographically targeted local schemes in partnership with other bodies and organisations are generally operated by local authorities. Conservation services have a direct day-to-day relationship with property owners in their area in a manner that echoes the role of their linked planning processes.

That said, due to cutbacks, in recent years there has been a substantial increase in the 'joint-working' in conservation matters between local authorities, with some acting on a consultancy basis for their neighbours or others fully amalgamated into joint services. While the immediate economic benefits are clear, as budget lines disappear, there is as yet no widespread understanding of the impact of these changed practices on planning outcomes. It is our understanding that, as the Atkins report suggests, and as current planning policy focus on neighbourhood planning notes, while specialist technical advice might be more readily accessed regionally, such 'planning from a distance' is not an effective way to deliver desired planning outcomes in conservation.

While these lessons help highlight some of the potentials and pitfalls of pooling strategies for conservation, in the absence of greater clarity on matters of archaeological advice and provision noted in the answer to question 1, it is not clear what answers may be on offer to archaeological advice. Atkins may again offer some insight to pooling with museums, outsourcing/privatisation and independent charitable provision in these areas.

Archaeology advice and provision typically works over a greater geographical area primarily because of the organisational set up in two tier authorities, while many services are county based, as noted in Atkins. In Wales four Archaeological Trusts

provide advice on a cross authority basis for numbers of authorities regionally. Some advise as many as thirteen individual authorities. Each provides archaeological advice and information across a range of services to a number of local planning authorities. In Scotland, where available, archaeological advice and provision operates effectively either as 'in-house' or 'out-sourced' depending on circumstances.

However we would stress that the statutory duties and planning infrastructure of conservation services indicate that the 'public service' role of the conservation service is most effectively carried out in the context of the public service of the planning system. How that service then accesses the requisite information – archaeological, demographic, economic and otherwise – and what kind of structures are used to provide that information – private sector or otherwise, remain separate questions for conservation. It is not clear to what extent this is a limitation to sharing, outsourcing or privatising archaeological advice and information.

There is not a one size that fits all for conservation management, and in the absence of better data we imagine that is also the case for archaeological provision. The regional approach appears in some areas to work well for archaeology provision, but cannot work so successfully for building conservation without close ties to planning, as conservation work demands more visits and constant involvement throughout the development process. Duplicating such connections in conservation processes would add costs to the processes rather than help reduce them.

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

We note with some concern the section in the consultation document on the new model for English Heritage that highlights 'sharing' as an 'imaginative response', implicitly endorsing it (4.13), when to our knowledge there is no long-term data to justify such an interpretation or a pro-active policy position. We would urge English Heritage today, and its components in the future, to work more closely with partners, not least through the National Heritage Protection Plan, to identify what are the particular characteristics of the distinct services in advance of making unilateral policies. The adoption of pre-determined strategies would be most unhelpful in an era when, more than ever, constructive partnership and open discussion is critical.

More particularly too, for the IHBC we would again note our concern in the focus on 'heritage protection'. Our preferred strategy is for heritage management within the planning system, not heritage protection outside it.

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

The planning system has structures increasingly able to address challenges arising in maritime development, and we would urge any models to look first to working with and underpinning those structures rather than to try to evolve a parallel controls system, both for reasons of minimising complexity for users and maximizing operational efficiencies. The land-based systems can operate effectively when properly resourced, and we have no knowledge of any evidence that suggests that an alternative system would add benefit. Indeed looking to a parallel system echoes the additional complexity of process already represented by scheduling, a complication that the unsuccessful heritage bill had been devised to eliminate.

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

The matter is not about where the standards are produced, but that they are credible and usable. The particular problem here is that the 'sector' referred to is, presumably, archaeology, while the management processes that are of interest to archaeology are much wider. In this case, standards need to recognise and reflect the needs and practice of users, not a single-sector approach.

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?

See 1 above

Broader collaboration

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

Conservation accreditation

The IHBC is keen to raise awareness of and understanding in conservation principles across all disciplines, including archaeology. The Institute is very happy to advise on a strategy for archaeology practitioners to achieve conservation accreditation. We have little doubt that recognition of the value of such accreditation would enhance skills available to local conservation services in planning, as they already do in other relevant disciplines. Notably, as these operate equally across the private and public sectors, conservation accreditation in archaeology would add substantially to capacity-building and service efficiencies in all aspects of planning for the historic environment

Training

Though IHBC has a strong legacy in training, it is unfortunate that national heritage-focussed bodies supporting funding for early career specialists have failed to recognise the benefits, and value of our skills sets to wider conservation and heritage management outcomes. We believe that the current strategies of funding skills sets in heritage that ignoring the role of built and historic conservation specialisms represents a missed opportunity. We would encourage archaeology interests to promote capacity building outside the archaeology activities specifically under consideration in this consultation.

Analysis

Corporately, the IHBC has developed a substantial information base, research legacy, volunteer network and internal competence to support its advocacy of conservation. To support and inform the archaeology issues under consideration here, we would encourage research partnerships across suitably informed interests in activities relating to the management of the historic environment, including in particular archaeology practice, standards and services.

HER Service standards

It is critical that the potential of the construction and development industries to deliver conservation (and *inter alia*, archaeology) also be considered in this consultation. While the PPS 16 strategy cited above has generated investment in private sector information gathering for archaeology, there is a much wider locus for these industries to contribute to knowledge gathering. The IHBC has noted in its research into HERs standards for the built environment has highlighted some key opportunities here, opportunities that would enhance HER services, understanding across communities and access to information in historic environment management and conservation through the planning system.

8. In what ways could the knowledge and enthusiasm of third-sector organizations 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?

Planning in the UK is founded on democratic input, and so is inherently supportive of the kind of participative 'mix' referred to, subject only to matters of capacity, which remains the key barrier to successful outcomes. As noted above, there is probably no single model for all areas, so the critical matter here is to enable such a 'mixture' and the recommendations are geared towards this strategy.

- Better education in to help users understand distinctions between outcomes in conservation and archaeology, in particular regarding the operation of the planning system
- Better standards in conservation-related activities supported by archaeology advice and provision, with the IHBC prepared to offer guidance and structures in these matters
- Better knowledge of what conservation entails and how it is achieved
- Better appreciation of the processes and outcomes as they relate to the planning system, not least as that system is the key management process for the built and historic environment, both for today and for the future.

IHBC

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