



Jim Williams,
Guidance Team,
Historic England,
EC4R 2YA
jim.williams@historiceng
land.org.uk

IHBC National Office
Jubilee House
High Street
Tisbury
Wiltshire
SP3 6HA
Consultations@ihbc.org.uk
25 April 2024

Dear Sir

Consultation on guidance for Reburial of archaeological sites

The Institute of Historic Building Conservation 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.

We are very pleased to have the chance to comment on the consultation document. The Institute's comments in relation to the Consultation questions are as follows:

1. Please provide your name and contact details as this will help us to contact you if we need to ask you any additional follow up questions. Following the consultation process these will be deleted.
Institute of Historic Building Conservation
Consultations@ihbc.org.uk
2. How would you characterise your role: archaeological contractor, archaeological consultant, curator (Local authority archaeologist), local society member, university academic, student, or other?
Response: Professional Institute
3. The updated guidance has reiterated the previous version's recommendation that wherever possible, reburial should be undertaken using the material removed from the site being reburied. Is this advice clearer in this new revision? What more could be done to strengthen these recommendations?

Response: IHBC welcomes the Advice Note and believe that with a number of provisos set out elsewhere in this response that the final document will be of assistance in projects where the intention is to protect archaeological sites beneath or within development as well as in relation to other land-use or site management work.

4. For some sites, keeping material on site for reburial might be impractical (but would ultimately make reburial decisions much simpler if soil was retained). Please share your knowledge and experience of working on sites where all excavated material is removed from site. How practical are the recommendations in the guidance for retaining some of this material (see for example section 5.1)? How could they be improved?

Response: See question 5.

5. There is a recommendation (see 2.3 and 4) that reburial is considered from the start of any archaeological excavation and that an initial reburial design is included in a WSI, for sites where you expect to encounter remains that you might wish to rebury, or for sites you might be excavating seasonally. How practical is this and how could these sections be updated to make them more effective?

Response: The critical thing here is finding the right professional to assess at an early enough stage to assess the significance of the remains and to assess the state of preservation of the remains; and to take the most appropriate decisions concerning the reburial of remains. This also applies in the case referred to by question 4.

We would suggest there is a stronger indication of the need to engage with technical specialists who understand not only how to bury a site but also appreciate the building conservation requirements of any features. IHBC would like to see stronger emphasis on the need for expertise for structural remains within an archaeological site prior to reburial using suitably experienced practitioners but perhaps adding the benefits of engaging an architectural historian too. A link to the IHBC Database of Accredited Practitioners would also be helpful (<https://ihbc.org.uk/accredited/>)

Section 4 mentions that it would be good practice for the initial reburial design to be included in the WSI. Whilst it is accepted that the reburial design will need to be finalised once the excavation of that feature is complete. There should be a minimal requirement in the WSI for any reburial not to be carried out until the methodology for the reburial is designed in accordance with this document, documented, and agreed upon with the relevant authority. If

consideration of reburial is omitted entirely from the initial WSI and left until the end of the excavation, there is a danger that some features will be buried along the way and not in accordance with this guidance.

6. The updated guidance recommends undertaking a series of assessments and data collection prior to making decisions about the reburial of archaeological sites. Do you have any questions or concerns about the information that you might have to collect, the availability of specialists needed to help collect or analyse this information, or any other aspect of the assessment or decision-making process?

Response: A link is provided in the guidance to the HE document on how to find the right professional help. Under the heading 'Conservation experts' there is a link back to IHBC. Possibly there is a need to flag more strongly the engagement of the appropriately qualified professional to make critical decisions such as how to bury a site but also the building conservation requirements of any features as early as possible.

IHBC suggest that an element of contingency be added to the time requirement of reburial in the objectives section 1. The discussion that short-term solutions often end up being long-term solutions does come later in the document, but it is important enough to bring forward.

7. A reburial checklist is included in this updated guidance. How useful is this checklist? What could be added / clarified to make it more useable for you?

Response: The need for reburial consent should be mentioned earlier in the document. Repointing could require consent if the feature is designated. Section 4.4 does highlight environmental protection and the potential requirement for additional consent eg SSSI.

8. A number of references are included in the guidance, largely to provide the evidence for where the text has been drawn from. It is also born out of the experience of the authors. Are there any sections of the guidance which you feel need more explanation because you don't have access to the references and sufficient information hasn't been provided?

Response: The advice about movement of moisture and the section on mortars need additional information. See comments provided in response to question 10.

9. The final text will also include illustrations of the various points made in the guidance. If you have any images to share which you feel support the messages in the document, we'd be interested in hearing from you.

Response: We do not

10. Do you have any other comments that you'd like to make about the guidance?

Response: There is much discussion about how moisture moves from one layer to another, but there is no real discussion of the potential for masonry to act like a wick. If a feature transcends multiple layers, you need to consider how moisture might move through the feature from one stratigraphy layer to another.

In relation to the Box Text on Mortars we strongly suggest there is a need for caution about giving too much detailed advice here, particularly the part on pozzolans, which are generally not well understood, even by some conservation professionals. The information in this box needs to explicitly provide that repair mortars need to be specified and carried out under the supervision of an accredited conservation specialist. If the document is going to provide detailed advice there is a need to consider earth mortars also. These are just as likely to be encountered in the archaeological records as lime mortars, if not more so and are often not recognised. We also suggest replacing the words 'weak' and 'strong' with 'flexible' and 'brittle' when describing non-hydraulic and hydraulic mortars.

Yours sincerely,
Fiona Newton