



· INSTITUTE · OF · HISTORIC ·  
BUILDING · CONSERVATION

*Making Heritage Work*

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Dear Sirs

**REALISING THE BENEFITS OF PLANNING-LED INVESTIGATION IN THE HISTORIC ENVIRONMENT: A FRAMEWORK FOR DELIVERING THE REQUIREMENTS OF PPS5**

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. It may be noted that while this response specifies the IHBC's serious reservations over many of the key recommendations in the report, cross-referencing against our *Corporate Plan 2010-15* will easily confirm that there are a number of areas where the overlapping interests of our respective professional memberships could benefit from effective collaboration between their professional bodies. Indeed the IHBC did provide access to our substantial communications and other networks as a mark of our support for the principle of the research. However the Institute did also recognize at the outset that it could not justify the scale of resource allocations demanded to secure the kind of project outcomes that our members would expect.

The response consists of 3 parts:

1. General observations & clarifications
2. Additional areas of concern
3. Recommendations

**A. General observations & clarifications**

A.1. IHBC was not a member of the project board.

The primary concern for the IHBC in this report is that it errs in the identification of its project board. Under 2.1.10 it states that the IHBC chair, Jo Evans, was on the project board representing the IHBC. This is not correct. In fact the IHBC confirmed to the IfA's Chief Executive on 24 August 2010 that the Institute was not in a position to have any high-level links with the project.

#### A.2 Implications of errors over IHBC involvement

Given the error in that citation, the suggestion of high-level project involvement by the IHBC implies that the Institute or its senior officers had a particular locus in shaping the project, content and recommendations. As the IHBC did not play such a role, the final report should evaluate the impact of that error on consultation responses, using clear, specific and critical terms of reference.

#### A.3. Methodological concerns

We have some concerns over the lack of clear linkage between the recommendations and the consultation, research and related investigative activities on which they are based. The lack of detail in this area makes it difficult to see how the generality of a recommendation is in reality a reasonable response to concerns raised in consultation, and not simply a preferred option for a particular interest group.

Example: Under recommendation 24, 'Managing quality by person', while we agree with the need to focus on additional methods of quality assurance in the future, it is not clear why or how the promotion of chartership in the IfA is a cost effective response to the challenges faced by the archaeology sector, especially considering our Recommendation C.1 below.

In particular we do not have confidence that IfA would be helping either the archaeology or the non-archaeology parts of the historic environment sector, or their respective stakeholders, by attempting to offer chartered status to 'historic environment practitioners'. In fact the draft report itself provides substantial confirmation of the potential problems that would arise from such a strategy.

#### A.4. Representation of historic environment interests

The report consistently generalizes its discussion around historic environment interests, activities or skills, while then applying it exclusively to archaeology and/or its understanding of development-led investigation. This is inappropriate and unhelpful, and in places even misleading.

Example: At 3.6, the title for the research refers to 'historic environment services' but the opening sentence specifies its actual focus, '... an economic evaluation of the market for archaeological service....'.

#### A.5. Representation of conservation interests

The report regularly implies that it speaks on behalf of 'the historic environment sector' but fails to recognise the distinct balance that conservation must achieve between investigation, records & information, and securing a sustainable future for the fabric or character, that is 'conservation'.

The report suggests its statements are universally applicable despite the fact that PPS 5 is quite specific about the priority of fabric over record, and that – whatever the overlap for many practitioners – conservation skills are recognised internationally as being distinct from archaeology skills. As PPS 5 points out, at HE 12.1: 'A documentary record of our past is not as valuable as retaining the heritage asset'

Example: The research justifying planning-led and development-funded investigation in the context of PPS 5 should recognise first that historic buildings, for example, are goods in economic terms – raising potentially substantial costs

as well as benefits. Here social, cultural and environmental values – including the priority given to a record – must be balanced against the economics of conservation.

#### A.6. Limited remit of 'Vision'

The report's 'vision' is presented as a statement from a wide body of sector interests about a wide range of activities. In fact it has limited application, both in terms of its understanding of historic environment stakeholders and of the interests it purports represent.

Example: The report states that it 'outlines a vision for the sector where management of the historic environment is a partnership between local authorities and community groups'. (Executive Summary). However it fails to register properly the many other interests that need to be considered both in conservation and in the wider planning and management processes that are key concerns for conservation professionals.

### **B Additional areas of concern:**

#### B.1 Interpreting Public Benefit & Values

The references to public benefit and values of the historic environment in the context of PPS are inferred as applying across the sector, but are applied only in terms of archaeological interests. Typically the authors omit the wider spectrum of social, economic and environmental processes and benefits associated with heritage and its management across the planning system.

In fact it is widely recognised that the past few decades have seen heritage deliver huge economic and social benefits, supporting sustainable physical and economic regeneration, and that there are part of the public benefit heritage brings.

The narrow archaeological focus is especially notable in the failure to recognise that the conservation of fabric and character can bring public benefit without any archaeological involvement.

Example: 3.1.3: 'Heritage Lottery Fund (HLF) and Architectural Heritage Fund (AHF) grants have enabled local groups to 'save' numerous historic buildings.' We do not consider that highlighting the term 'save', with all its condescending overtones, represents an appropriate understanding of key values in heritage protection.

#### B.2 Planning practice

Though there is substantial ambiguity in the language throughout large parts of the document, as noted above, the report also may indicate limited understanding of how planning decisions on heritage are taken, either under previous guidance (PPGs) or under the PPS and wider planning policy (which isn't mentioned).

In particular, across many areas in the report the lack of distinction between planning and 'development-led investigation', suggests that the distinction is not clear to the authors.

Example: 3.7.10: 'The vision for ensuring quality in the management and development led investigation of the historic environment ...'

#### B.3 Owners and the private sector

There is almost no recognition of the diverse roles of owners in the care of historic places. When it does appear it is negative. The report takes no account of the fact that

private owners are the primary carers of the historic environment, are responsible for the vast majority of investment in its care and conservation – even if that can be variable – and that conservation specialists value highly the substantial contributions private owners make to the sector.

More particularly, the LSE's economic study, which in this context is too technical to contribute usefully to the debate, also fails to recognize the key role owners play in caring for historic or traditional fabric. This understanding provides essential context to any discussion of understanding-based benefits. Indeed in the section listing the 'actors', owners do not merit mention!

Example: 'Decisions made by individual property owners/developers do not take account of wider social benefits and so can have *negative externalities*...' (3.6)

#### B.4 Sustainable development

The report does not appear to recognise that both conservation professionals and the planning system already have a long history of adding value to the management of change in the context of sustainable development. This includes benefits that sit within the specific remit of the report – such as development led investigation informing decision-making – as well as areas in which such archaeology will continue to play relatively minor roles.

Example: The report states that, in the future, the sector 'adds value to development by contributing to the sustainable development agenda, to design, brand, place-shaping, securing consents, risk management, PR, CSR, marketing and sales/rental values.' (Executive Summary)

#### B.5 Economics

In line with Southport's archaeological aspirations, the LSE research project explores heritage assets only as 'environmental goods', and even then only from an archaeological perspective. In the context of planning and conservation, and the operation of PPS 5, this is an inappropriately narrow perspective even considering the reports archaeological interests.

Example: Under 3.6, the section headed 'The valuation of heritage assets' identifies only their value as environmental goods.

#### B.6 Consolidation

Consolidation is a continuing theme in the report, as it has been in many outputs from the project managers in recent years.

The IHBC's promotion of sector consolidation has focussed primarily with developing links between its operations, standards and ethical frameworks and those interests that are central to the shaping of our historic places, notably mainstream construction, development and environmental sectors. These priorities are stated in our current Corporate Plan, publicly available on our website.

The IHBC also has a substantial interest in archaeological approaches to the historic environment, and ensuring that these operate at an appropriate level. Consequently it is appropriate that our thoughts feed into the concerns identified in this report.

In that context large parts of archaeological advocacy appear to us to lack coherence or the capacity to progress. Discussions there seem to find great difficulty in moving beyond their own primary archaeological concerns despite a clear desire to participate on a wider stage. The ease with which it finds endorsement from partner bodies operating within its own area of interest undermines its inability to interpret and assimilate wider views. This is well represented by the relatively simple topic explored by the report –

development-led investigation - and the lack of logic to, or clarity in, forward progress for the sector.

Given these severe problems, consolidation within the archaeological interests of the historic environment sector must be the first priority for the leading members of Southport. Such consolidation could learn from the benefits arising from the IHBC's own remarkable consolidation of a much more diverse range of professional and sector interests, a process that is still only in its early stages.

The IHBC integrated specialist interests across private and public sectors and disparate disciplines both from the built and historic environment sectors, from archaeology to architecture. Thus, though not much smaller than the IfA, the IHBC integrates sector representation across bodies equating to archaeology's IfA, ALGAO, FAME and, presumably, many others. While recognising the huge advances made in the sector over the past two decades and more, much has been achieved with the direct support of key government agencies. Given the current capacity reductions in central government, consolidation in archaeology could mark the next step in revolutionising the impact of that sector on wider , while also providing a more relevant and pertinent vision for Southport to progress.

### B.7 Valuing information

The report is concerned primarily with re-interpreting development-led archaeological record-making in the context of enhancing understanding. However in attempting to lead that change in the archaeology sector, it does not seem to register that:

1. the historic environment itself already serves as a highly accessible public resource for understanding, and usually does not requiring any analysis or interpretation by archaeologists to make such information relevant. Anyone can tour a local town and, with a little guidance, improve their understanding, enjoyment and experience of the historic environment, all at no, or nominal, cost to the public purse;
2. substantial bodies of investigation, information and records already produced by architects, surveyors, planners and engineers and other mainstream professions do not register as resources here. This is despite the fact that they represent a vast body of research and interpretation material that has been barely touched for the purposes of interpretation and public benefit.<sup>1</sup>

In that context it would be an extremely useful exercise for the archaeology sector to re-assess priorities in new archaeological recording exercises. In light of the kind of public benefits identified in Southport – in particular if the focus is on 'understanding' - the re-assessment should adopt a strongly critical perspective on the value of creating new records when apparently so few have been used to secure public benefit to date.

Example: The report states that:

- 'The vision is that development-led research into the historic environment should
- be a collaborative venture involving commercially-funded, local authority, higher education and voluntary sector – studying the built, buried and underwater historic environment...
  - take account of the wealth of data from development-led projects and of current academic thought'

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<sup>1</sup> The IHBC, for example, as part of its HER 21 research, has identified key information resources - ranging from estate agents particulars to key texts in architectural history - that could be signposted by or included in Historic Environment Records to support conservation specialists.

However the lack of public benefit achieved in research to date, identified in Southport, suggests that development-led research may more usefully focus on historic investigation of existing information, and learning lessons on how best to use archaeological information outside that sector. It may be that recommendation 10 has a bearing on this area, but its meaning is unclear

### Public participation

The sections on public participation (3.1) appear to be quite narrow in their understanding of what that entails, in particular neglecting matters of use, of consultation and of third party interests, and also of how these engender change. The focus of the report is on investigation, recording, etc. rather than wider spatial planning matters from development control to placemaking. Most worryingly, the content of the report is expressed as though it includes those interests.

## **C. Recommendations**

The recommendations are articulated as a wish-list of ideas. To assist in the consultation they would be better re-interpreted as a forward plan for the archaeology sector.

To be meaningful to key stakeholders outside the archaeology sector, such a plan should consist of a prioritised set of proposals, with indicative costs, tied to the primary material created from the original reporting and investigative process.

To illustrate the benefits of such an approach we offer our own list of recommendations, with indicative costs or savings, benefits and references.

(Key: £=£1000s; ££=10,000s; £££= 100,000s @ estimated minimum costs)

### C.1. Consolidate players

The archaeology sector should work towards consolidation, beginning with the integration of private and public archaeology operations, represented possibly by ALGAO, IfA and FAME.

Given the small scale of that sector, the substantial policy overlap between these bodies - for example in the matter of development led investigation and the role of HERS as represented in the Southport report - and the direct and indirect public investment associated with these interests, substantial additional cost-savings should arise from this initiative.

Cost: ££Savings

Benefits: Coherent policy making across public and private sector archaeology; reduced replication of advocacy; administrative efficiencies; consolidation, as the distinction between internal and external stakeholders is clarified; capacity to focus engagement outside that sector.

Reference: See B.6 above

### C.2. Clarify terminology

Given the continuing confusion over the terminology applied in archaeology, that sector should clarify its use the language of archaeology so as to distinguish in particular the meaning of among other terms:

1. archaeology/ical, which can refer to a remnant of the past; a profession; a process for recording; a past-time; a recording process; and , most worryingly, a conservation process

## 2. the Historic environment, which is potentially everything

The starting point for such clarification, for England at least, could be the definition of archaeological interest in PPS, which specified it as the 'potential' for historic, architectural or artistic interest.

Cost: £

Benefits: Clarity in research and advocacy inside and outside the sector; enhanced standards, especially for users and clients; improved capacity to communicate

References: See A.4, A.5, A.6 and above

### C.3. Recognise skills

Recognising that archaeology is a discipline with diverse threads, and that archaeological activities often impact on successful conservation, the IfA (and/or its successor as per C.1 above), should require that any members advising on conservation be tested in and subscribe to a recognised international standard in conservation. Examples of such standards include those adopted by the IHBC and other built environment professional bodies (ICOMOS) and by the Institute of Conservation (ICON).

Encouraging the development, assessment and operation of specific skills in this area would bring coherence to the apparent lack of boundaries to archaeological operations and skills. It should also help reduce the need for additional quality assurance schemes that could only undermine credibility.

A useful recent precedent in this aspect of professional management has been established by the RIBA, a professional body with a long-standing anathema to any suggestion that its members might require specific skills in conservation. The RIBA's decision to recognise conservation skills as a specific area in their profession may provide a useful example to ease the impact on archaeology practitioners less clear on the value of quality assurance in conservation through appropriate skills assessment.

Evidently full professional membership of the IHBC is the most obvious way for archaeologists to demonstrate their competence in conservation.

Cost: Nil (potentially)

Benefits: This would help clarify the distinction between parts of the archaeology profession that concern themselves with conservation.

Reference: See especially A.5 above and the Southport report, especially e.g. Recommendation 24.

### C. 4. Research

The archaeology sector, with suitable partners, should undertake an analysis of the public benefit new archaeological records bring to 'interpretation and understanding', in terms of the Southport initiative. This exercise should be especially useful given the substantial body of archaeological and other historic environment information already extant and largely uninterpreted.

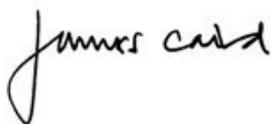
Such work could provide a systematic basis for giving priority to new research, in particular addressing the archaeology sector's own concerns over tools such as England's research frameworks.

Cost: ££

Benefits: This would confirm to government that the sector genuinely seeks best value in its operations. It would also underpin and rationalise investment in the HER sector by helping prioritise information needs. The IHBC is keen to contribute to this work, developing its research into the methodologies and standards for Historic Environment Records.

Reference: See B.7 above and 3.2.5 of the Southport report.

Yours faithfully

A handwritten signature in black ink that reads "James Caird". The signature is written in a cursive style with a large initial 'J'.

James Caird  
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