



Federation of Archaeological Managers and Employers
40 Queens Road
Bury St Edmunds
Suffolk IP33 3EP
T: 01284 767681
M: 07715 050318

E: info@famearchaeology.co.uk
W: www.famearchaeology.co.uk

Nick Bubalo
Area Director for Regeneration and Economy
Sandwell Council
PO Box 2374
OLDBURY B69 3DE

7 October 2011

Dear Mr Bubalo

Sandwell Archaeology Service

The Federation of Archaeological Managers and Employers (FAME) was concerned to read that Sandwell Council is proposing to delete its archaeological service.

FAME represents around 50 archaeological businesses providing advice and specialist services to commercial clients in the development industry throughout the UK. Its members have been actively engaged in archaeological excavation, recording and publication in Sandwell Borough, facilitated through the advice and expertise of the Council's archaeology service.

You state in your Equality Impact Assessment that "In identifying these posts the impact of not undertaking these functions was considered against what is required to deliver a planning service for the community of the Borough and the development industry. The impact of stopping doing these parts of the service will have no impact on front line service" and that "the functions identified are not core services to the planning service and could almost be considered to be a luxury".

However, the provision of an archaeology service enables the Council to discharge its planning obligations under Planning Policy Statement 5: *Planning for the Historic Environment* and the draft National Planning Policy Framework, to promote sustainable development and to maintain or have access to a Historic Environment Record. It also enables it to implement the policies set out in its own local development framework and any emerging neighbourhood development plans.

Loss of the service would have serious consequences for the archaeology of Sandwell, those businesses who record and interpret it, and those local residents and communities who benefit from it.

However, it would also have potential implications for our clients in both the public and private sector, who depend upon timely and expert advice to provide greater certainty

before planning applications are determined, and to reduce the risk to them of costly delays and disruption once planning consent has been granted and development is underway.

In our extensive experience of advising commercial clients and developers throughout the UK, the greatest risk they face in relation to archaeology is the uncertainty of proceeding with development without first having assessed its likely archaeological impact, and most regard pre-application archaeological advice and assessment as an essential risk-management measure.

We note that the EIA refers to the possible reinstatement of the service at some time in the future, financial resources permitting, but experience has shown that it is both more costly and difficult to reinstate such services once they have been lost than it is to maintain them.

Whilst we fully understand the budgetary pressures facing local government, we urge you to reconsider your proposals and seek ways in which necessary economies might be achieved without loss of the entire archaeological service.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'A Tindall', written in a cursive style.A horizontal line in blue ink that tapers to a sharp arrowhead pointing to the right.

Adrian Tindall MA FSA MIfA
Chief Executive, Federation of Archaeological Managers and Employers