

5. Federation of Archaeological Managers and Employers

Response of the Federation of Archaeological Managers and Employers

The Federation of Archaeological Managers and Employers (FAME) represents around 50 small and medium-sized enterprises providing archaeological advice and specialist services to commercial clients and developers throughout the UK. Our members employ around 2,500 archaeological staff, and include commercial consultancies, local authorities, university departments and charitable trusts.

The vast majority of our members' income derives from archaeological work delivered through the planning and development process and they represent the principal commercial users of Historic Environment Records and the development management advice provided by local government archaeology services. We therefore very much welcome the opportunity to comment on their future.

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?

Generally yes, although there is increasing evidence of variable standards and inconsistency of approach between different local authority services. The best services (Greater Manchester, Cheshire, Essex, for example) remain prompt, efficient and flexible, allowing proposed development to be managed in an efficient and sustainable manner.

However in the face of budgetary cuts there has been a very noticeable decline in the standard of many services. This takes the form of slower response times, unavailable staff and 'proforma' advice, often allied to escalating charges. There is also a very inconsistent interpretation of government planning guidance between different, often neighbouring, local authorities – some flexible and pragmatic, others rigid and dogmatic.

Such tendencies are only likely to be exacerbated by further reductions in resources, and this is of particular concern in view of the upturn in the economy and the increase in the number of planning applications coming forward.

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

Several unitary councils in the West Midlands, Teesside and Essex are currently without archaeological advice, and Cumbria is currently without an HER service. Merseyside was without any service for a period of around 18 months, at unknown archaeological cost, though an HER post has recently been reinstated.

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

Virtually all local authorities in England are working with diminishing resources, though the situation is more critical in some areas than others. In the North West, for example, partial or total withdrawal of archaeological services is planned in Cheshire, Lancashire and Cumbria. In the North East, Middlesbrough and Redcar and Cleveland councils have withdrawn support from Tees Archaeology, and Gateshead Council is proposing to withdraw its funding from the Tyne and Wear Specialist Conservation Team.

c. What trends have you identified?

Our members receive fewer opportunities to tender for work in areas where the archaeology service is reduced or suspended. In some areas there is a tendency to provide a 'passive response' service rather than one which actively screens planning applications, with a consequent reduction in commercial opportunities for our members. In areas where there has been a hiatus in service provision (Merseyside for example), our members have had no prospects at all of winning work.

The current emphasis on economic growth has been seen by some local authorities (Cheshire for example) as an opportunity to suspend any perceived 'constraints' on economic development, such as archaeology services. This is a fundamental misinterpretation of the objective of the NPPF, to promote sustainable growth.

In areas where archaeology services have been provided through Service Level Agreements (SLAs), increasing pressure on budgets has led some partner authorities to withdraw their funding, leading to inadequate or incomplete archaeological coverage.

The declining standards and escalating commercial charges of many local government archaeology services has been mentioned above.

2. What are the consequences of inadequate provision of archaeological advice to local authorities? The inquiry is particularly interested in the real or potential

- **loss of archaeological sites without intervention**

This is of course difficult to assess, simply because such losses are unmonitored. However, the hiatus in service provision in both Northamptonshire and Merseyside is almost certain to have resulted in archaeological loss, particularly given the previous level of archaeological activity in both areas. The lack of resources in surviving services has also led to a concentration

on known, rather than potential, archaeological assets, again almost certainly leading to archaeological loss.

- **loss of public benefits from participation opportunities, dissemination of the results of archaeological work, archives of the products of that work and interpretation via museums.**

The IfA Standard and guidance for archaeological advice by historic environment services states that this “must aim to benefit the public both now and in the future, through management and the advancement of understanding”.

Our members fully embrace their role in promoting public engagement and participation in development-led archaeology, and there are many successful examples of such participation adding huge value to development-led projects, for example York Archaeological Trust’s DIG Hungate and Oxford-Wessex Archaeology’s East Kent Access Road.

However, in many cases it is only possible to persuade commercial clients of the importance of such work when it is a specific requirement of the local planning authority. Where there is a reduced or suspended archaeology service, the opportunity for public engagement in development-led projects will either be curtailed or removed altogether.

There is also evidence of reduced archaeological services leading to a decline in the level of monitoring during the post-excavation stages of development-led projects, leading in some cases to the premature discharge of planning conditions and the consequent non-publication of the results. This outcome benefits no one, least of all the public.

FAME has also drawn attention in its survey of archaeological archives held by UK archaeological practices to the growing problem of completed archaeological archives which cannot be made publicly-accessible because there is no museum or store able or willing to accept them. This represents an archive of at least 9,000 archaeological projects which remains inaccessible and therefore provides no public benefit.

- **increased uncertainty and cost for developers**

We are particularly concerned about the potential consequences for our commercial clients of the deterioration in the coverage and standard of local government archaeology services, especially so, as the economy begins to recover and the pace of proposed development quickens.

Our clients depend upon the timely provision of clear and expert advice, to provide greater certainty before planning applications are determined, and to reduce the risk to them of costly delays and disruption should archaeological evidence come to light once planning consent has been granted and development is underway.

Any erosion of the standard of local government archaeological advice has potentially costly implications for the development sector. One local authority service, for example, is now advising applicants to allow 16 weeks between the issuing of a brief and the commencement of site works – a totally unacceptable and hugely expensive delay for the applicant and their development proposals.

- **failure to target advice and grants in rural areas**

We are unable to substantiate this, although the withdrawal of discretionary advice is an inevitable consequence of archaeological services being forced to restrict themselves to their core responsibilities.

- **loss of essential archaeological skills**

The IfA Standard and guidance for archaeological advice by historic environment services states that it must be provided by 'suitably qualified, skilled and competent advisors'.

Continuing skills gaps and shortages in the archaeological profession have been well documented since 1997 in the quinquennial Profiling the Profession surveys, since 2008 in the joint IfA/FAME Job Losses/State of the Archaeological Market surveys, and since 1997 in the ALGAO staffing surveys.

The diminishing resources of local government archaeology services, the increasing use of generic advisors to fill specialist roles, and the outsourcing of development management advice will inevitably lead to further skills gaps and shortages within local government, and this will in time of course be reflected in similar losses among practitioners.

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?

The brigading of local government archaeology services with, for example, building conservation, archives, museums or ecological services is already fairly widespread. It has been shown to provide short-term efficiencies, but can lead to unclear service objectives and does not appear likely to provide a financially sustainable model.

Shared services (already commonplace with 'back office' local government functions like HR and legal services) might provide a more resilient model of multicounty archaeology services. However, like SLAs, they are unlikely to promote a strong sense of ownership, and would therefore be vulnerable.

Outsourcing of archaeological advice to external providers has been tried in the past with mixed results. FAME members have a valuable and extensive skills base, which might be used to enhance local government archaeology services through call-off agreements, the commissioning of research projects, the management of HER services, outreach and education, and so on. Such arrangements can achieve financial economies, though they require careful management to avoid any potential conflicts of interest and still, of course, depend upon adequate funding streams.

An alternative model is that of the archaeological or heritage trusts. The four Welsh archaeological trusts, Clwyd-Powys Archaeological Trust, Dyfed Archaeological Trust, Glamorgan-Gwent Archaeological Trust and Gwynedd Archaeological Trust were set up in the

1970s as independent limited companies with charitable status, to form a comprehensive network of archaeological organisations covering the whole of Wales. They maintain the HER, advise the constituent local authorities (for which they receive both local authority funding and core funding from Cadw), provide volunteering opportunities and undertake fieldwork and research through their commercial arms.

A similar example in England is Heritage Lincolnshire, which advises three Lincolnshire districts, promotes public engagement through individual membership, and undertakes fieldwork and research through its commercial arm Archaeological Project Services.

This model has proved highly successful in providing comprehensive and public-facing archaeology services over wide-ranging county or multicounty areas. The main disadvantage is a perceived conflict of interest between their advisory and contractual roles. This can be a contentious issue for their competitors, and requires the enforcement of strict protocols or codes of practice.

A further model may be that of multicounty archaeological services, jointly provided by local government and English Heritage (or its proposed successor, Historic England). The current consultation on the English Heritage New Model provides an opportunity to review the relationship between national and local government archaeological advisors (4, below).

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

English Heritage has a tradition of promoting capacity building and partnership with local government archaeological services dating back to the 1970s, with the establishment of the first SMR officers. This was followed in the 1990s by the first development control officers, and subsequently by Extensive Urban Surveys, Historic Landscape Characterisation projects, Countryside Adviser posts, Urban Archaeological Databases, HER21, and so on.

EH continues to provide strategic support to local government archaeology services through its highly-regarded network of Regional Science Advisors, and also maintains the Greater London HER and provides archaeological advice to 31 London boroughs through the Greater London Archaeology Advisory Service.

In our view the proposed EH New Model presents a rare opportunity to review fundamentally the relationship between archaeological services provided at local and national levels. There is a very strong complementarity between Historic England's core roles of maintaining a national data archive and providing advice on the designated heritage, and those of local government to maintain Historic Environment Records and provide advice on the (largely) undesignated heritage.

Placing Historic England at the centre of a national framework of heritage protection would enable it to underpin and scrutinise local advice and promote best practice, consistency and impartiality in its delivery, maintain data and performance standards for HERs, and take the lead in the achievement of regional and national research objectives.

In the face of diminishing local government resources, there is now both a need and an opportunity to develop new models of collaborative working, service sharing and even the pooling of resources, between national and local archaeological services. Such models would require major cultural change at both national and local level, but would have the potential to harness the strengths of strategic perspective and national consistency with those of local knowledge, responsiveness and accessibility.

However this would have to be matched by strong government support for the new body, to reverse the serious reduction in grant-in-aid suffered by English Heritage since 2010, and to equip Historic England for its new role at the centre of a national framework of heritage protection.

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

There is increasing pressure on the marine and maritime historic environment, through aggregate extraction, tidal management and offshore energy, as well as through environmental factors such as coastal erosion and sea level change. Expertise in the marine and maritime historic environment is rarely provided by local government, again providing an argument for closer partnership with Historic England.

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

The IfA Standard and guidance for archaeological advice by historic environment services states that this “must be clear, consistent, compliant, reasonable, timely, informed and impartial, and should be proportionate to a reasoned and clearly-documented assessment of known or potential significance”.

Whilst this is undeniable, we question whether it is currently being met in all respects and by all local government archaeological services. The current standards are necessarily generic and therefore less than effective as a measure of quality, and we believe that they need to be sufficiently detailed in matters of process, performance and accountability to allow more rigorous scrutiny and more consistent enforcement.

It is of course essential that any charges for commercial users of a service are clearly linked to service performance.

We believe that current sector-produced standards should be extended to national heritage agencies.

We also believe that local government archaeological services should comply with external standards, for example the LGA/BPF 10 commitments for effective pre-application engagement.

We would particularly welcome a statement from government reiterating its commitment to valuing the historic environment, and providing guidance to local authorities on the requirement for, and scope of, a basic historic environment service - which should consist at the very minimum of providing a publicly-accessible and up-to-date HER maintained by qualified staff to nationally-agreed standards.

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?

Ideally yes, with of course increased resources and improved standards of service closely allied to a national heritage protection framework. However in the current local government climate we do not believe the status quo can be sustained in the long term.

b. If not, which model or models for alternative provision would you recommend, and why?

There is no universal model of service provision - different models will be suited to differing local circumstances.

For the reasons given above (4), we would favour the establishment of properly-resourced and regulated HER/advisory teams, working at county or multicounty level in close partnership with, and supported by, Historic England. This might be a similar model to the HER/advisory services currently provided by the four Welsh Archaeological Trusts.

Broader collaboration

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

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

There is a long and distinguished tradition of voluntary engagement in archaeology, and in our view it is vital that this be maintained. The most successful examples of public engagement can add huge value to development-led projects (2, above) and work in close partnership with local government archaeology services. Successful examples include the Portable Antiquities Scheme, Cambridgeshire's JIGSAW project, and Bristol City Council's Know Your Place website, though there are many others.

However, the essential ingredient of all such schemes is a small core of professional staff, able to motivate, mobilise and manage the work of their many volunteers. Without this, the

opportunity for third sector engagement in archaeological work would be severely diminished.