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22 June 2015

Dear Jim,

**Consultation on Historic England Guidance: Preservation in situ, condition assessment and monitoring<sup>1</sup>**

Thank you for the opportunity to comment on this draft Guidance.

**The Chartered Institute for Archaeologists**

The Chartered Institute for Archaeologists (CIfA) is a professional body for the study and care of the historic environment. It promotes best practice in archaeology and provides a self-regulatory quality assurance framework for the sector and those it serves.

CIfA has over 3,250 members and more than 70 registered practices across the United Kingdom. Its members work in all branches of the discipline: heritage management, planning advice, excavation, finds and environmental study, buildings recording, underwater and aerial archaeology, museums, conservation, survey, research and development, teaching and liaison with the community, industry and the commercial and financial sectors.

**Preservation in situ, condition assessment and monitoring**

**General**

CIfA welcomes the publication of this draft guidance. Although the Valetta Convention on the Protection of the Archaeological Heritage requires States to make provision '*for the conservation and maintenance of the archaeological heritage, preferably **in situ***' (article 4ii), the Institute agrees that '*condition assessment needs to be fully integrated better within the process of site evaluation and form a key part of discussions and decisions about whether and how a site is preserved*' (page 1 of the draft guidance).

This guidance should make a significant contribution to such integration and consideration and the brief, detailed comments below should not detract from ClfA's support for it.

### **Detailed Comments**

#### **Under page 1**

Although the draft makes quite clear that it applies to '*schemes on terrestrial archaeological sites*', it would be helpful if Historic England could produce parallel guidance on preservation in situ in a marine context where such issues can be particularly contentious.

#### **Under page 2**

The first text box on this page equates 'preservation in situ' with 'conservation', but the two terms are not synonymous. Indeed, Historic England defines 'preservation in situ' as '*conservation of the archaeological asset in its original setting*' [my underlining] (see <https://www.historicengland.org.uk/advice/technical-advice/archaeological-science/preservation-in-situ/>).

#### **Under page 4**

Section 1.3 of the draft states that: '*Given the breadth of topics covered in this document and the detail provided, it is intended that this guidance will be used by a range of different audiences.*' We agree and hope that the guidance will be used by both archaeologists and others (including planners and other professionals). However, the structure of the document, with detailed technical information interspersed with more general planning and management advice to aid decision-making, may detract from its use by non-archaeologists.

The technical information is undoubtedly valuable and should not be lost, but could perhaps be more clearly separated from the general advice and guidance. For instance, the summary of guidance at section 7 (page 48) might be promoted to the front end of the document or even reproduced as a stand-alone document and key advice and guidance might be signposted more noticeably in the document.

#### **Under page 49 et seq**

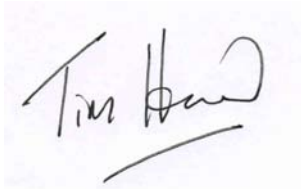
The Case Studies at section 8 of the draft are helpful and complement the guidance.

#### **Generally**

The guidance would benefit from the identification and signposting of relevant professional standards including ClfA Standards and guidance such as those for historic environment desk-based assessment ([http://www.archaeologists.net/sites/default/files/node-files/ClfAS&GDBA\\_2.pdf](http://www.archaeologists.net/sites/default/files/node-files/ClfAS&GDBA_2.pdf)) and archaeological field evaluation ([http://www.archaeologists.net/sites/default/files/node-files/ClfAS&GFieldevaluation\\_1.pdf](http://www.archaeologists.net/sites/default/files/node-files/ClfAS&GFieldevaluation_1.pdf)).

If there is anything further that I can do to assist, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tim Howard', with a horizontal line underneath.

Tim Howard LLB, Dip Prof Arch  
Senior Policy Advisor

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<sup>1</sup><https://content.historicengland.org.uk/content/docs/guidance/preservation-in-situ-condition-assessment-monitoring-text-only-consultation-draft.pdf>