

Sarah Paynter  
English Heritage  
Fort Cumberland  
Fort Cumberland Road  
Eastney  
Portsmouth  
PO4 9LD

[sarah.paynter@english-heritage.org.uk](mailto:sarah.paynter@english-heritage.org.uk)

29 January 2015

Dear Sarah,

**Consultation on draft Guidance for archaeological and historic pottery production sites**

Thank you for the opportunity to comment on this draft Guidance.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. The Institute was granted a Royal Charter of Incorporation on 03 June 2014.

CIfA has over 3,150 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.

**Draft Guidance for archaeological and historic pottery production sites**

**Question 1. Purpose: Does the document meet the requirements for guidelines on archaeological and historic production sites i.e. will it help ensure best practice at these sites?**

1.1 The publication of this document is welcomed as a way of promoting best practice for this site type. However, although it promotes best practice, it is not clear how compliance will be monitored. The Institute would be happy to discuss this aspect of the guidance further.

**Question 2. Balance: Do you think the guidelines achieve a good balance between the different topics (project planning, survey and excavation, dating and sampling, post-excavation, archiving etc.) and issues for different periods?**

2.1 The approach to section 2, identifying different topics, is helpful and the section on archiving is particularly welcome. Nevertheless, the balance between the different topics could be better.

2.2 The coverage of different periods is also somewhat uneven.

2.3 Sections 3 and 4 are informative and interesting and support the guidance, but it would be helpful more clearly to distinguish between guidance and background information.

**Question 3. Issues: Are there any issues that are not addressed in a satisfactory way?**

3.1 The following detail would be useful

- more information about the associated material culture, especially kiln furniture
- schematics of production sites
- further consideration of proportionality given the high costs of some projects.

**Is the advice appropriate and achievable?**

3.2 The advice is generally appropriate and, as best practice, should be achievable. However, monitoring and enforcement mechanisms are required to ensure that compliance with such advice is achieved. CfA Standards and guidance are cited (which is welcomed), but further consideration should be given to how English Heritage's advice can be more fully integrated with CfA Standards and guidance and enforcement procedures (<http://www.archaeologists.net/codes/ifa>).

**Question 4. Ease of Use: Is the document easy to navigate? Do the headings and sub-headings accurately reflect the contents of those sections? Is the terminology appropriate for the audience? Is the text clear or are parts difficult to follow?**

4.1 Generally the text is easy to follow with appropriate terminology and a useful glossary. Nonetheless, the structure of the document might benefit from some minor revision.

4.2 The following specific matters should be addressed:

- there is too much detail on some of the analytical and quantification aspects
- the role of fabric descriptions from hand samples (and photographs of fresh breaks) requires more discussion
- the role of regional fabric series is noticeably absent.

**Question 5. Images: Please indicate if the figures are appropriate. Do you have images that make the point better, which we would be able to use?**

5.1 Figure 1 is not clear. It would be better served by a readable schematic or plan detailing the potential complexities of a production centre.

5.2 There should be more images of kiln furniture and perhaps an illustration by means of a flow chart of stages and specialist input.

**Are the images acknowledged correctly?**

5.3 No comment.

**Question 6. Case Studies: Are these helpful?**

6.1 Yes.

**Question 7. Length: Is the document an appropriate length?**

7.1 Yes.

**Question 8. Structure: We do not anticipate making major changes to the structure of the document. However, we would like to know if you feel strongly that the structure could be improved.**

8.1 Section 4 (overview of production) should be before section 3 (evidence of production).

**Question 9. Bibliography: Please advise of mistakes, or useful additions.**

9.1 The references to Institute for Archaeologists (IfA) Standards and guidance on page 45 should now be references to Chartered Institute for Archaeologists (CIfA) Standards and guidance. The Standards and guidance, themselves, have been updated to reflect this (<http://www.archaeologists.net/codes/ifa>) and updated references need to be given.

**Question 10. Glossary: Please advise of mistakes, or useful additions.**

10.1 No comment.

**Question 11. Where to go for help: Are the links and contact details up to date?**

11.1 No. The reference to the Institute for Archaeologists (IfA) should now be one to the Chartered Institute for Archaeologists (CIfA). Furthermore, so far as we are aware, TWM Archaeology Projects is no longer being curated and the National Fabric series has been taken off line.

**Are there any significant omissions?**

11.2 No comment.

**Question 12. Name and cover: Does the document name and cover accurately reflect the contents and appeal to the relevant audience?**

12.1 The document might be better named: 'A Guide for the historical and archaeological study of pottery production sites'.

## **Other Comments**

### *Under section 1.1*

Why do the guidelines not cover other ceramic material since much of the advice will apply to other ceramic materials?

### *Under section 2.1, paragraph 1*

The Institute welcomes the reference to ClfA Standards and guidance, but these are applicable to all projects, not just those which are part of the planning process. As noted above, since the publication of this consultation draft, the Institute has adopted the name 'Chartered Institute for Archaeologists (ClfA)', so any reference to the Institute (for instance, here and at section 2.1.1) should be to the Chartered Institute.

### *Under section 2.1, paragraphs 2 and 3*

ClfA wishes to see greater clarity with regard to the role of specialists. In the first instance, 'specialist' should be defined (as someone working at MClfA – Member - level). Secondly, the importance of including specialists in the project team (see paragraph 3.1.2 of ClfA Standard and guidance for the collection, documentation, conservation and research of archaeological materials (2014) <http://www.archaeologists.net/sites/default/files/node-files/ClfAS&GFinds.pdf>) should be made clear. The current reference to 'consultation with specialists' in paragraph 3 is insufficient.

### *Under section 2.1, paragraph 5*

Reference could be made to research frameworks in this paragraph.

### *Under Table 1*

The first component of 'production technologies', which refers to 'wares' should embrace the full range of vessel types.

### *Under section 2.2.2.1*

We would suggest replacing the words 'at the earliest opportunity' with 'as soon as the site type is identified'.

### *Under section 2.2.2.2, second sentence*

The reference to seeking specialist advice in some respects reinforces the view of the specialist as outside the process. The specialist should be providing advice as part of the project team deciding what material to retain.

### *Under section 2.2.2.2, third sentence*

Specialist input is required, not only in developing the selection strategy, but at all stages of the project (see paragraph 3.1.2 of the ClfA Standard and guidance cited above). The guidelines should make clear that a retention policy should be agreed between stakeholders

(including the project manager, the planning archaeologist, the curator and specialists) before commencement with potential for review during the different project stages.

*Under 'Material to retain for study', paragraph 4*

This paragraph should be more explicit as regards the person who decides what is representative. Provision needs to be made for competent on-site finds personnel, with input from specialists, to control unstudied discard.

*Under sections 2.3.1 and 2.3.2*

A more general outline may be more suitable than some of the detail in these sections. For instance, details with regard to the use of a rim chart are unnecessary and raise further issues (such as the need also to measure base equivalents).

*Under Thin Sections*

Although there are references to PPL and XP in this section, there is no further explanation as regards plane polarised light and cross polars. Nor is there any mention of sample size although this indicated for chemical analysis in section 2.3.3.3.

*Under section 3.1*

It would help to introduce the term 'clamp kiln' in the first paragraph and provide a schematic of the kiln.

*Under section 3.2*

This section would benefit from the addition of some drawings of kiln furniture and some more detail about finds likely to be associated with pottery production.

*Under section 4.4*

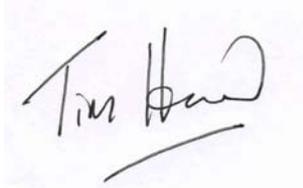
Too much detail about decoration should be avoided. Illustrated examples and mention of the tools used may be the best approach.

*Under section 4.5*

There is a risk that this section may fall between two stools. The guideline should either provide more data on firing (for instance, as to reduction and oxidisation) or less.

CIfA and its Finds Group would be happy further to contribute to the development of these guidelines. In the meantime, 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 on a light blue background. The signature reads "Tim Howard" in a cursive style, with a horizontal line underneath.

Tim Howard LLB, Dip Prof Arch  
Senior Policy Advisor