



Advisory Panel on the Archaeology of Burials in England (APABE)
c/o Dr Simon Mays
English Heritage
Fort Cumberland
Eastney
Portsmouth, PO4 9LD

21 August 2014

Dear Simon,

Consultation on Sampling Large Burial Grounds

Thank you for the opportunity to comment on this consultation.

The Institute for Archaeologists

The Institute for Archaeologists (IfA) 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.

IfA has over 3,000 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.

IfA has successfully petitioned for a Royal Charter of Incorporation which was granted on 03 June 2014.

Sampling Large Burial Grounds

General

IfA welcomes the publication of this draft guidance note which provides valuable advice to practitioners. Notwithstanding IfA's general support for this guidance, the following, detailed comments address the substance of the draft.

Detailed Comments

1. It would be helpful further to clarify the scope of this guidance.

(1) References such as those to the National Planning Policy Framework suggest that it is aimed primarily at planning-related work, but there are other contexts unrelated to development to which the guidance could apply.

(2) Although the note is aimed at *'archaeological fieldwork projects dealing with large burial grounds'*, there is no clear guidance on what constitutes a 'large burial ground'. This is particularly significant given the implicit assumption that all large burial grounds will be nationally important. (See, for instance, page 3 of the draft note which states: *'Not all have designations as heritage assets that reflect their significance. ...*

'Non-designated heritage assets of archaeological interest that are of demonstrably equivalent significance

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to scheduled monuments should be considered subject to the policies for designated heritage assets” (NPPF para 139).’) If this is the case, then ‘large burial grounds’ should be clearly defined and the case for treating them all as nationally important should be explicit. On the other hand, if it is envisaged that there will be non-designatable large burial grounds, guidance should be given on their identification and treatment.

(3) Although the note highlights (at the bottom of page 3 and the top of page 4) the breadth of archaeological evidence available and the multi-faceted significance attached to burial grounds, its focus is primarily upon osteoarchaeological material¹. Either more in-depth consideration should be given to non-osteological material in the note (for instance, section 4.2 deals with ‘*how to sample the skeletal assemblage*’, but there is no corresponding section on environmental or other sampling), or the title (or introduction) should be amended specifically to refer to human remains or osteological material (as is the case with English Heritage’s 2005 guidance).

2. If the PPS5 Practice Guide (to which reference is made in the second paragraph on page 4) is still current at the date of publication, reference could helpfully be made (possibly by way of a footnote) to the impending replacement of this Guide by Good Practice Advice to provide an element of future-proofing.

3. The statement at the beginning of section 2 of the note that ‘*Archaeological excavation, analysis, publication and archiving of records and finds from a burial site impacted by development will discharge the responsibilities of a developer in accord with the NPPF*’ is potentially misleading and requires qualification. It might be read to suggest that such development will always be permitted provided that excavation, analysis, publication and archiving of records and finds take place. In fact, ‘*Substantial harm to or loss of designated heritage assets of the highest significance ... should be wholly exceptional*’ (NPPF, paragraph 132). The above statement in the note could be clarified by adding the words ‘*Where undertaken as a condition of planning permission ...*’ and referring to paragraph 141 of the NPPF (including the last sentence, which states that ‘*the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.*’)

4. The section on ‘*Development and Sampling*’ also refers to ‘*the costs and logistical difficulties in dealing with very large numbers of skeletons*’. IfA appreciates that there are issues of balance, proportionality and reasonableness that have to be addressed in developer-funded (and other) work. However, care needs to be taken not to undermine the principles of the NPPF by advocating what is ultimately unsustainable development. If extensive and expensive excavation and analysis are required, this may be because of the scale of the damage, and the cost of offsetting that damage should not obviate the requirement to offset. Planning Practice Guidance at paragraph 16 emphasises that

‘the National Planning Policy Framework is clear that where safeguards are necessary to make a particular development acceptable in planning terms, and these safeguards cannot be secured, planning permission should not be granted for unacceptable development.’

5. Although it is suggested at page 4 of the note that ‘*costs of dealing with very large assemblages are also examined* [in the guidance note]’, the only quantification of costs appears at page 8:

‘Calculating at 2014 rates, and using a generally accepted formula (Mays, 2005: 44), post-excavation analysis of 15000-20000 well-preserved skeletons is likely to require about £2m, with excavation, publication and archiving cost on top of this.’

This estimate may be a reasonable one, but provides a headline figure which may alarm developers of smaller sites and undermine the efforts of curators to impose reasonable obligations in such cases. The example (15,000 – 20,000 well-preserved skeletons) appears far to exceed the largest assemblage ever analysed thus far (Spitalfields) and might more realistically envisage large burial grounds of a scale more frequently encountered in practice. Providing brief details of a methodology for such calculations may

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also be more helpful, as may providing some general indication of the costs of the excavation and assessment phases (which would put the analysis costs in context).

6. The very real problems of archiving are touched on in the opening paragraphs of section 3 but no solution is proposed. This may be beyond the scope of guidance such as this, but some indication of an approach to addressing these issues would be timely.

7. Section 3.1 should

- identify the need to bring in appropriate specialists to advise on sampling and excavation approaches at the pre-evaluation stage, including biological, conservation, health & safety and artefact specialists (in addition to osteoarchaeologists)
- highlight the need (in planning-related cases) for the evaluation to be proportionate and targeted to identify the significance of the site and the impact of development upon that significance and for an appropriate mitigation strategy to be developed including design mitigation options (with sufficient information to ensure preservation in situ is achievable, if proposed, without significantly altering burial conditions).

8. The note should make clear that archaeological input to the balancing exercise which takes place in the planning process (as elsewhere) needs to be carried out in accordance with IfA's Code of conduct and Standards and guidance (<http://www.archaeologists.net/codes/ifa>) and in consultation with curators, clients and other stakeholders. This includes the need for appropriate project designs and defined research objectives which might helpfully be alluded to in more detail in the note. If and insofar as there is diverging professional opinion about the correct approach to sampling strategies, this should be acknowledged in the guidance note with the emphasis upon the need rigorously to justify any proposed approach on a case-by-case basis (as stated in the third bullet point on page 12).

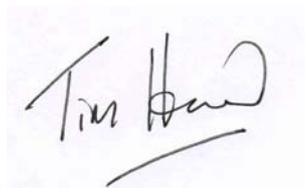
9. The flow chart at page 10 is helpful, but would benefit from the following

- including at the DBA stage an assessment of the significance of the burial ground and an assessment of impact upon the significance (see the IfA Standards and guidance on desk-based assessment: http://www.archaeologists.net/sites/default/files/node-files/DBA2012-New_Format.pdf)
- including at the evaluation stage a re-evaluation of significance and impact
- promoting preparation of a WSI to the evaluation stage
- making clear (possibly in a footnote) that all stages should be carried out in accordance with IfA Standards and guidance (<http://www.archaeologists.net/codes/ifa>).

10. Useful recommendations could be made in the note about the training potential of the assemblages in question.

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

Yours sincerely,



Tim Howard LLB, Dip Prof Arch
Policy Advisor

¹ The Case Studies are also confined to medieval / post-medieval burials excavated in London and it would be helpful to consider a wider range of examples.