

Submitted by online form

17 April 2019

Re: Local government finance and the 2019 spending review inquiry

Dear Madam/Sir,

I am writing to you on behalf of the Chartered Institute for Archaeologists (ClfA) in response to the inquiry into local government finance and the 2019 spending review. Our response focuses on the effect of service cuts and financial uncertainty on local government archaeology services. These services are responsible for maintaining and managing historic environment records, providing advice to planners and developers as part of the development process, monitoring compliance, as well as contributing to community engagement and the delivery of wider public value.

They represent one of the many areas of local government spending which have been put under pressure by cuts in the past 10 years. While examples of education and frontline community services such as libraries are likely to be more politically sensitive, cuts facing museums and historic environment services form part of the same wider issue of services which are being failed by models of financing local government.

We have several suggestions for how to pursue a strategy for resilient and proportionate historic environment services. However, we recognise that radical changes may be coming for wider local government reorganisation. The issues facing archaeology services should be considered within this wider debate, and opportunities sought to overcome present issues.

About the Chartered Institute for Archaeologists

ClfA is the leading professional body representing archaeologists working in the UK and overseas. We promote high professional standards and strong ethics in archaeological practice to maximise the benefits that archaeologists bring to society and provide a self-regulatory quality assurance framework for the sector and those it serves.

ClfA has over 3,800 members and more than 80 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.

1. General comments

- 1.1. It is difficult for us to answer broad questions about the efficacy of models of local government funding or to advise on what models might generally be more appropriate. What we can observe is that funding cuts have led to a decline in the quality of service provision and have raised concerns from both the independent historic environment sector and from the government's lead advisor on the historic environment – Historic England.
- 1.2. These concerns include that many services are currently or soon likely to experience capacity issues, causing a vacuum in service provision which has the potential to slow down or stall planning applications and the delivery of development projects, and which is also likely to contribute to sub-standard decision-making which puts archaeology and the conservation of the historic environment at risk.
- 1.3. We do not have the competence as an organisation to advise on how the overall funding needs of local authorities are assessed. However, we would like to point out that under present models, non-statutory services such as archaeological advice (which is required under planning policy, but which is regularly considered in local authority budgetary reviews as a discretionary expenditure) are suffering from a detrimental decline in funding as a result of the increasing cost of other statutory responsibilities.

2. Local authority archaeology services: Problems

- 2.1. Over the past 10 years local government budgets have seen a real terms cut of 30%. The result of this is that conservation and archaeology services have been severely affected by cuts, with some authorities lacking any expert advice to support planning and LBC decisions.
- 2.2. Since 2006, the number of archaeological specialists and conservation specialists advising local authorities in England has fallen by 35%. Under the current funding outlook, it is unlikely that these cuts will be reversed, and are likely to deepen in the increasing demand and reducing resources for other core local authority services.
- 2.3. In a 2016 report¹, government's lead advisor on the historic environment, Historic England stated that;

“Capacity issues will ... emerge within Local Authorities. These are likely to be exacerbated by the public spending squeeze to be implemented in Spending Review 2015. Current capacity is 845 FTE across both Archaeology and Conservation, and the implications of the infrastructure programme are that an extra workload will be imposed. As this is specific to the timetable of development in local areas it is presently almost impossible to model.” (p.3)

¹ [‘Urgent need for more trained archaeologists’ \(Historic England, 2016\)](#)

And furthermore that;

“At present local government curators do seem to have the capacity to handle the current HS2 workload, perhaps because it is distributed across a wide area rather than all focussed in one place. The expectation is that an increase in proposed projects will result in a proportionate increase in workload. Thus, when fieldwork begins, this may become unmanageable.” (p.34)

- 2.4. Where authorities lack expert archaeological advice, it is impossible to know what damage is being caused to heritage, but it can be shown that limited oversight has drastically decreased the number of planning applications receiving archaeological conditions, far below the national average of 3% of all planning applications in some of these areas. Examples of authorities which have dispensed with archaeological advice include Teesside, Stratford-upon-Avon, and Lancashire (where 2 posts have recently been reinstated).
- 2.5. One aspect of this service weakening has been that accepted models of service delivery are being abandoned in favour of ones which are based on lower standards or weaker principles. Many such systems seem to be designed to not break the rules, rather than deliver good, proportionate, and effective service.
- 2.6. One effect of the cuts has been that activities such as community engagement, increasing public access to online and physical records, and contribution to placemaking within local authorities has been under strain, as skeleton staff focus solely on development control.
- 2.7. A related issue is archive capacity in local authority museums, where there is a widespread lack of capacity and lack of staffing expertise to accept or deal effectively with archaeological archives².
- 2.8. Generally, the common models for operating archaeology services have been successful and remains viable if appropriately funded. For example, joint arrangements between county and district authorities has on the whole been successful and is one of the very few examples voluntary funding by districts to counties.
- 2.9. However, such arrangement although successful and cost effective are not supported by government policy or guidance and as the experience of Tees, Lancashire and Stratford district Warwickshire county joint arrangement has recently shown, they are tenuous and subject to short-term decisions that can have long term negative effects on the protection of heritage and result in increased costs.
- 2.10. Even without these threats there are long-standing problems with local government historic environment services: Commentators have cited resourcing, lack of clear statutory underpinning, duplication between tiers, gaps, lack of a joined-up approach to the historic

² [Annual survey of Museums Collecting Archaeology \(2017\)](#)

environment, skills deficits, difficulties in maintaining defined service standards and for some parts of the sector an absence of defined service standards.

2.11. We recognise that wider reform to the structures for financing local government could provide either a further threat or an opportunity to reform the way in which archaeology services deliver sustainable development.

3. Recommendations

3.1. Over the past 10 years, the archaeology sector has worked to identify and promote solutions to the funding problem facing local authority archaeology services. The sector is undertaking a range of current activities to enable this (see appendix).

3.2. Among recommendations for the Committee to consider, in the context of wider reform to the financing of local government, are the following:

- Government should follow up on recommendations in the report by John Howell MP and Lord Rupert Redesdale³ which concluded that if a proposed national levy for funding archaeology services could not be agreed, then the government would have to look at making these services subject to a statutory duty.
- The Committee should work with Historic England to identify how their work, mandated in the 2016 Culture White Paper to identify how “more support [can be offered] to local authorities, reduce demand on local services through clearer guidance, and encourage new delivery models that make the best use of resources”⁴ is being delivered.
- The committee should explore what benefits could be achieved through allowing local authorities to set their own planning fees to cover the full cost of delivering properly resourced and supported planning processes, ensuring that advisory services such as archaeology which assure sustainable development are included in costings. However, we note that certain areas of the country margins within which it is possible to raise fees are thin.

3.3. We support the Committee’s engagement with the future of local authorities and believe that the archaeology and historic environment sectors should be ready to provide leadership in designing principles for how to ensure effective changes to the structure of resourcing local authority historic environment services, in the context of any wider reforms that the committee recommends. We hope that this process can ensure that local

³ [The Future of Local Government Archaeology Services \(2016\)](#)

⁴ [Culture White Paper \(DCMS, 2016\)](#)

authority archaeology services do not come under even greater pressure in the next government spending round.

Yours sincerely,



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Appendix: List of existing sector activities

1. The Heritage Alliance, The Archaeology Forum and the previous government have advocated for placing HER services on a statutory footing – though it is recognised that opportunities for primary legislation of LROs may be few.
2. ClfA and ALGAO have developed a service standards for archaeological advice, based on service outputs. Compliance with this standard is measured, inter alia, through ClfA's organisational registration process. An equivalent approach, or one that serves the same purpose, could usefully be developed for conservation services.
3. A HEF subgroup is developing a benchmarking method to predict the level of input any LA historic environment service is likely to need to meet the required standard.
4. Evidence to the Vaizey review of LG archaeology services identified a need for incentives to LAs wishing to reform services, eg by combining historic environment functions into a single team or by merging or sharing resources with other authorities, service providers or HE.
5. Historic England's draft corporate strategy and draft action plan have identified a need to support capacity building in local authorities.
6. Those giving evidence to the Vaizey review, and others, have identified the need to ensure that additional, transitional funds and support are given only to those authorities already meeting the current standards, or with a very clear long-term commitment to doing so – so as to avoid the danger of shifting the funding responsibility from the local authority to eg HE with no guarantee of a resilient service.
7. Various sector stakeholders see enhanced planning fees of fess for LBC being a solution – provided they are linked to the maintenance of an at least adequate service – and one solution would be to ensure that fees earned by planning services are earmarked for planning expenditure. This approach may gain some purchase politically.
8. HEF skills task groups believe that the long-term provision of historic environment skills, especially those serving the planning and development processes, is best secured by the fostering of client demand for accredited, skilled experts. Market research has been proposed to determine how best to stimulate and sustain such demand.