

# THE ARCHAEOLOGY FORUM

*a grouping of independent bodies concerned with archaeology*

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Rt Hon Margaret Hodge MP  
Minister for Culture, Creative Industries and Tourism  
Department of Culture, Media and Sport  
2-4 Cockspur Street  
London  
SW1Y 5DH

8 August 2008

Dear Minister,

## **DRAFT HERITAGE PROTECTION BILL**

We are writing to you on behalf The Archaeology Forum (TAF) following publication of the Culture, Media and Sport Committee's report on the Draft Heritage Protection Bill. As you are no doubt aware from our correspondence with Andy Burnham and from our written and oral evidence to the Committee, the Forum is a very strong supporter of the draft Bill, which we believe should create a more effective, coherent and open system for heritage protection. We are greatly pleased that the Committee's report similarly welcomes the proposed legislation. We do feel, though, that it may be useful to emphasise a few key points in our evidence that are not fully picked up in the report.

While we recognise that there are concerns in the historic environment sector about resources and welcome the commitment you made in your evidence to keep the costings in the impact assessment under review, we are inclined to repeat the evidence we gave that we do not have any evidence that the impact assessment significantly underestimates the resource implications of the proposed changes. This does not mean, of course, that we consider all local authority historic environment services to be adequately funded at present. Some authorities have chosen to devote less resource than others to these services, and there are significant disparities. This separate issue remains a very pressing one to be addressed.

Possibly the report does not fully articulate how the changes in legislation both reflect and accelerate significant changes in practice, whereby previously separate systems for managing historic buildings, archaeological sites and other heritage assets are becoming integrated. This is a highly desirable process and we concur with the view that a substantial training investment is needed to enable specialist conservation officers, archaeologists and others to manage the full range of historic asset types. Intelligently handled, and with appropriately directed resources for

capacity building in local authorities, such a process will help to address any short-term skill-shortage or age-profile problems. We would welcome an authoritative quantification of this issue.

We did in our evidence refer to a number of archaeological issues that the report does not fully reflect but that we hope to take up with your officers shortly. These include

- the importance of the Historic Environment records as the essential reference point for current knowledge of heritage, informing the planning process and enabling local communities to research and appreciate their past and present environments – and the need to promote investment in them as not all are yet able to fulfil these roles adequately
- consideration of how to improve protection of urban areas of archaeological significance from developments outside the planning process, a consideration that is presently imperfectly and patchily addressed through the provisions for Areas of Archaeological Importance (we do not argue for the retention of AAIs and believe that the draft Conservation Area clauses may provide a more effective mechanism – our evidence appears to have been misinterpreted)
- ensuring that adequately skilled practitioners and advisers can be called upon to deal with sensitive heritage assets (our evidence here could be amplified and we welcome the offer you made to the Committee to allow us to explain the issues and proposed solutions to you more clearly)

In conclusion we would like to reassure you that the archaeological bodies we represent, which reflect the wide range of roles in our discipline, remain fully committed to the principles and aims of the draft Bill, and encourage you and your officials, making improvements where necessary, to press ahead with these much needed reforms. We are, of course, keen to offer our expertise and insights where this will assist.

Yours faithfully



Peter Hinton  
Convenor

Dr Gill Chitty  
Secretary

#### The Archaeology Forum's members are

*The Association of Local Government Archaeological Officers UK*  
*The Council for British Archaeology*  
*The Institute of Conservation*  
*The Institute of Field Archaeologists*  
*The Institute of Historic Building Conservation*  
*The National Trust*

*The National Trust for Scotland*  
*Rescue: the British Archaeological Trust*  
*The Society of Antiquaries of London*  
*The Society of Antiquaries of Scotland*  
*The Standing Conference of Archaeological Unit Managers*  
*The Society of Museum Archaeologists*