Planning for Archives: Opportunities and Omissions

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List of Abbreviations

AAF	Archaeological Archives Forum
ADS	Archaeology Data Service
ALGAO	Association of Local Government Archaeological Officers
ARCHES	Archaeological Resources in Cultural Heritage: A European Standard
CIL	Community Infrastructure Levy
DCMS	Government Department of Culture, Media and Sport
DOI	Digital Object Identifier
EAC	European Archaeological Council
EIA	Environmental Impact Assessment
FAME	Federation of Archaeological Managers and Employers
HE	Historic England
LPA	Local Planning Authority
NPPF	National Planning Policy Framework
NPPG	National Planning Policy Guidance
РХА	Post Excavation Assessment
SMA	Society of Museum Archaeology
UPD	Updated Project Design
WSI	Written Scheme of Investigation

1. Introduction

The Planning for Archives project arose from the CIfA/HE 'Archaeology in the 21st Century' Workshop on archaeological archives, held in April 2017. This identified a series of tasks and outcomes that needed to be addressed in order to 'solve the archives problem.' The workshop drew upon earlier research and information gathering on the subject, such as the 2012 Edwards Report on Archaeological Archives, and also the work of the Archaeological Archives Forum (AAF).

The main project driver is a requirement placed upon Historic England (HE) by the Department of Culture, Media and Sport (DCMS) to develop recommendations for tackling the archives issue, recently reinforced by the Mendoza Review (2017)¹ into museums. Archaeological archives had also previously been raised in the Howell & Redesdale Report into Local Government Archaeology (2014)². It is increasingly realised that the problems around archives are cross sector, involving planning archaeologists, field archaeologists, specialists, post-excavation staff and museum curators. This report reflects the interests of the planning archaeologists (through ALGAO:England) and focusses on how that group can realistically contribute to the solution.

The aim of the project is to understand the relationship between national planning policy (locally interpreted and applied) and the creation and management of archaeological archives. The main project objectives are:

- To examine critically the wording and objectives of the National Planning Policy Framework and supporting documentation with regard to archiving to determine the suitability or otherwise of current wording.
- To determine whether the requirements for 'useful' archives as set out in European Guidance are accurately reflected and achievable within national planning policy.
- To identify the differing interpretations of the wording, and subsequent opportunities afforded by the same, made by local planning authorities.
- To ascertain blockages to delivering effective archiving through the planning process and identify potential ways round/past.
- To identify areas for improvement in the current process.
- To share best practice of archiving amongst local planning authorities.

To ascertain the answers to these issues the project distributed a survey to all 87 ALGAO:England member organisations, although two had no officers in post and therefore could not respond. 51 responses were received giving a 60% response rate to the survey. This number is broadly in-line with the 61% to 65% response rate for archive related questions in the ALGAO:England Staffing, Planning and Casework Survey for 2017³. The 2018 Staffing, Planning and Casework survey did not contain questions related to archiving in order to avoid the duplication of the results from this projects survey questions.

² 'The Future of Local Government Archaeology Services':

³2017 ALGAO 'Staffing, Planning and Casework Survey':

¹ 'The Mendoza Review: an independent review of museums in England': <u>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/673935/</u>

The Mendoza Review an independent review of museums in England.pdf

http://www.appag.org.uk/future_arch_services_report_2014.pdf

https://www.algao.org.uk/sites/default/files/documents/England%20staffing%20and%20service%20and%20pl anning%20and%20casework%20survey%202017.pdf

Following on from the completion of the survey, three workshops were conducted during October and November 2018 in London, York and Bristol. These workshops were attended by 36 individuals representing 29 separate ALGAO:England member organisations. Representatives of the following organisations and projects were also in attendance at all, or some, of the workshops: Historic England (HE), Archaeology Data Service (ADS), Society of Museum Archaeology (SMA), Federation of Archaeological Managers and Employers (FAME), Chartered Institute for Archaeologists (ClfA), RESCUE and the 'Seeing the Light of Day' Partnership Project (Devizes Museum). ALGAO is grateful to those organisations for their support.

The survey, workshops, and subsequent research provided important information and insights to address each of the six project objectives. Each project objective will be addressed separately below. This report also includes a series of five case studies that highlight best practice and innovative approaches used by various ALGAO:England members in relation to archaeological archiving. The final recommendations, based on the evidence produced throughout this project, are located in section 7 of this report.

2. Objective 1: To examine critically the wording and objectives of the NPPF with regard to archiving to determine the suitability or otherwise of current wording

Below is discussion relating to tiers 1, 2, 3 and 4 planning documentation defined as follows:

- Tier 1 National Planning Policy Framework (NPPF)
- Tier 2 National Planning Policy Guidance (NPPG)
- Tier 3 Historic England produced Good Practice Advice notes (GPA)
- Tier 4 'Sector' produced guidance documents

2.1 Tier 1 Documentation - National Planning Policy Framework 2018

Archaeological archiving is addressed in a single paragraph and footnote of the National Planning Policy Framework (2018).

Paragraph 199 of the NPPF states⁴:

'Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible (64). However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.'

Footnote 64 of the NPPF states:

Copies of evidence should be deposited with the relevant historic environment record, and any archives with a local museum or other public depository.

Successful archaeological archiving is achievable under the current wording of paragraph 199 as it continues to take place in parts of the country. At no point during the project was the NPPF mentioned as a blockage to producing archaeological archives. The document clearly states the requirement 'to make this evidence (and any archive generated) publically accessible'. While definitions for 'archive' and 'publically accessible' require further definition, this should be provided within tier 2 and 3 supporting documentation.

The footnote importantly refers to 'a local museum or other public depository'. This therefore allows for a broad interpretation of meaning. This means both museums and non-museums can theoretically act as an archaeological archive repository so long as they are 'public'. The exact definition of 'public' in this instance is an area that relies heavily on supporting documentation. As four ALGAO:England members act as the primary archaeological archive repository for their area, it is important that the definition within this footnote does not impose the limitation that archaeological archives could only be stored and curated by local museums.

⁴ National Planning Policy Framework Document:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/ National_Planning_Policy_Framework_web_accessible_version.pdf

2.2 Tier 2 Documentation - National Planning Policy Framework Guidance

Archaeological archiving is also addressed within the National Planning Policy Framework Guidance document that accompanies the NPPF. As with the NPPF archaeological archiving is addressed in a single paragraph (141)⁵ that states;

Local planning authorities should make information about the significance of the historic environment gathered as part of plan-making or development management publicly accessible. They should also require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

The statement referring to archaeological archives in this document is identical to that contained in the NPPF. However, the nature of the NPPG allows the opportunity for further definition. Therefore, there are two aspects where further definition of the terms would aid the delivery of successful archiving;

'...any archive generated':

The NPPF and NPPG do not provide a definition of what is meant by the word 'archive'. While the sector has a broad understanding of what constitutes an 'archive' from an archaeological project, further definition of or reference to this term within the NPPG is recommended to ensure that misinterpretation does not take place. The definition of an archaeological archive in the 'Archaeological Resources in Cultural Heritage: A European Standard' (ARCHES) would be suitable for this:

'An archaeological archive comprises all records and objects recovered during an archaeological project and identified for long term preservation, including artefacts, ecofacts and other environmental remains, waste products, scientific samples and also written and visual documentation in paper, film and digital form.'⁶

'...publicly accessible':

The NPPF and NPPG do not clearly define what is meant by 'public accessible'. Further definition of this term is crucial for the delivery of archaeological archiving. The recent definition put forward by the SMA of a 'publically accessible archive repository' would be an important addition or reference to the NPPG from this perspective. This definition crucially states that qualified staff are a major factor in maintaining a publically accessible archive. The SMA defines a publically accessible repository for archaeological archives as:

'An accredited repository for the collection, curation and safe-guarding of archaeological archive material which is pro-actively managed and developed by staff qualified to ensure continued public engagement with, and the best possible access to the archaeological

⁵ NPPF Guidance Document 12, paragraphs 126 to 141: <u>https://www.gov.uk/guidance/national-planning-policy-framework/12-conserving-and-enhancing-the-historic-environment#fn:30</u>

⁶ 'A Standard and Guide to Best Practice for Archaeological Archiving in Europe', EAC Guidelines 1, pg. 20: <u>http://archaeologydataservice.ac.uk/arches/Wiki.jsp?page=The%20Standard%20and%20Guide%20to%20Best</u> <u>%20Practice%20in%20Archaeological%20Archiving%20in%20Europe</u>

resource, for the purposes of enquiry, exhibition, learning, research, inspiration, enjoyment and general interest.⁷⁷

There are many stakeholders involved in the successful production of archaeological archives in the historic environment sector. Therefore, it is important that those organisations who represent the sector lobby government for these definitions to be added to the NPPG.

2.3 Tier 3 – Historic England Guidance Documentation

The Historic England Good Practice Advice note that covers archaeological archiving is 'Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning 2⁸'. The sections of this document that cover aspects within the scope of this project concern Written Scheme of Investigations (WSIs), Archaeological Conditions and Obligations for WSIs and Reporting, Publishing and Archiving. Each of these sections will be addressed below.

2.3.1 Written Scheme of Investigations (WSI)

Archives are referred to within this section of the guidance with the following statement:

'Proposals for the assessment, analysis, publication, dissemination, archiving and curation of the results of the investigation. Assessment and analysis may need to be a two stage process with detailed proposals for investigation and analysis being agreed following completion of the assessment stage'

This statement clearly states that archiving should be addressed at the WSI stage. This is a broad statement and would benefit from further guidance on exactly how this could be achieved. This information can be provided within other best practice documentation provided by other organisations that are more intimately involved with the approval of WSIs rather than Historic England itself e.g. ALGAO:England as a representative of planning archaeologists.

This part of the document would also be the appropriate place to state the need of archaeological contractors to create Data Management Plans for projects, in any future revisions of the document. The results of Historic England's current 'Creating a sectoral standard and guidance for managing digital data generated from archaeological investigations' project (project reference 7796) also known as 'Dig Digital' should provide further guidance on Data Management Plans that could feed into this document. Data Management Plans will be primarily addressed in section 5.4 of this report.

2.3.2 Archaeological Conditions and Obligations for WSIs

Archives are referred to within this section of the guidance with the following statement:

'The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be

⁷ SMA 'Publically accessible repositories & archaeological archives', 2018, pg. 2: http://socmusarch.org.uk/socmusarch/gailmark/wordpress/wp-content/uploads/2018/04/Publicallyaccessible-repositories.pdf

⁸ Historic England's 'The Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning 2' can be found here: <u>https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/gpa2/</u>

discharged until these elements have been fulfilled in accordance with the programme set out in the WSI'

While this statement addresses the deposition of archive material, it does not state where that material should be deposited. There is no mention of public access, which is the sole requirement of the archive quoted in the NPPF. Therefore a small addition to the statement should reflect this. A proposed rewording is:

'The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of the resulting material within a suitable publically accessible archive repository. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI'

2.3.3 Reporting, Publication and Archiving

This section of the good practice advice contains the most detail information related to archaeological archiving. Archiving is covered by the following two paragraphs:

39 Local planning authorities are advised to ensure that the compilation, deposition and appropriate conservation of the material, digital and documentary archive in a museum, or other publicly accessible repository willing and capable of preserving it, forms an integral part of any recording project. Securing the archive of an investigation according to the terms of deposition or guidelines issued by the receiving body will facilitate future research. Proposals for these stages of work will have been included in the WSI but may need to be updated following completion of the on-site investigation.

40 The CIfA publishes standards and guidance for the creation, compilation, transfer and deposition of archaeological archives (CIfA Standard and Guidance: Archives), while advice is also available from the Museums Association and individual museums and archives. Deposition of copies of reports and site summaries with the HER is vital in providing an evidence base that can be called on by applicants for future development and by planners when drawing up plans and making decisions, as well as being important to local communities. Advice on the content of site summaries may be available from the HER.

Throughout the whole of the good practice document there is no definition of what actually constitutes an archaeological archive. While this documents does outline the three main aspects of an archive as being material, digital and documentary, further definition would certainly be advantageous. The ARCHES definition quoted above is suitable for this use as it clearly highlights the difference between an archive and a collection which is a distinction that can often be conflated.

Likewise, a supporting definition of a 'museum, or other publically accessible repository' should be included. The current SMA definition quoted above, which highlights the requirement for suitable staffing, should be supported and applied. A separate definition of an accredited digital archive repository and Core Trust Seals should also be included⁹ to help prevent organisations that are not suitably proficient in curating digital archive from receiving it.

⁹ Further information about what a Core Trust Seal for digital data repositories is can be found here: <u>https://www.coretrustseal.org/about/</u>

3. Objective 2: To identify the different interpretations, and subsequent opportunities afforded by the same, made by local planning authorities

3.1 Variety of approaches by ALGAO: England members

The survey sent out to ALGAO:England member organisations and the subsequent workshops indicate that there is a diverse range of approaches to archaeological archives used by planning archaeologists in different local authorities across England. There were few aspects of archaeological archiving where there appeared to be a consensus in the approach taken across the country. The survey asked respondents to state in which documents they refer to, or expect reference to, the following aspects of archaeological archiving:

- The identification of a repository for archaeological archives
- An acknowledgement of potential costs for archiving
- Transfer of Title
- Use of potential selection strategies
- Unique requirements for archaeological archive (Conservation, Display etc.)
- Estimation of size of archive
- Other claims to material within the archive (e.g. Treasure Act, war graves etc.)

The results of these responses are below:

	Pre- App	Brief or Specification	WSI	РХА	UPD	Final or Archive Report	Archive Prep	Do not refer	Other
Identification of a repository	24%	53%	94%	43%	53%	45%	29%	0%	2%
Acknowledgement of potential costs	18%	25%	57%	27%	27%	25%	24%	24%	20%
Transfer of Title	2%	20%	51%	31%	29%	31%	45%	27%	8%
Use of potential selection strategies	10%	18%	65%	53%	41%	25%	35%	12%	10%
Any unique requirements	16%	22%	55%	65%	53%	49%	33%	4%	16%
Estimation of size of archives	6%	8%	33%	59%	41%	27%	31%	12%	12%
Other claims to material	14%	29%	75%	51%	41%	37%	29%	6%	10%

Table 1: Percentage of ALGAO:England respondents that indicated at what stage their authority refers to, or expects reference to, a particular aspect of archiving.

The only area where there is a clear consensus is that almost all respondents (94%) expect the archive repository to be stated within a WSI. For the other six questions there is considerably more variety in the approach taken and a greater amount of inconsistency in the process. There does appear several

other areas where a smaller majority of respondents have indicated that they broadly follow the same approach:

- 75% (38/51) expected WSIs to include reference to potential other claims to the archive such as artefacts covered by the Treasure Act
- 65% (33/51) expect WSIs to include reference to use of potential selection strategies
- 65% (33/51) expected PXAs to consider conservation needs and display potential of material
- 59% (30/51) expected PXAs to include an estimation of the size of archive

It is also clear from these results that the vast majority of ALGAO:England respondents do expect most aspects of archiving to be dealt with at some point within the archaeological planning process. The only areas where 20% or more of respondents did not refer to, or expect reference to, were the acknowledgement of potential costs and the Transfer of Title. The issue over the acknowledgement of costs may be a reflection of the fact that not all archive repositories currently charge for deposition and therefore the question was not applicable for some respondents. Issues related to Transfer of Title will be treated separately in section 5.3 of this report.

The variety in approaches taken by different local authorities across England is likely result of organic growth over time and responses to local issues. This meant that there are a number of innovative approaches that have been developed and are being used by certain ALGAO:England members to produce successful archiving for their area. These authorities include:

- Cambridgeshire County Council the authority is the primary archive repository for their area and therefore have a strong working relationship between archive staff and planning archaeologists within their team. This has meant that they have been able to use PXAs effectively to secure archives.
- Devon County Council the authority has been very successful in getting digital archives deposited with the ADS through the use of their specifications and expectations of WSIs.
- Lincolnshire County Council the authority's use of archiving timetables have been proven to be an extremely successful tool for the delivery of successful archiving.

Further information on approaches taken by these authorities can be found in section 6 of this report. The approach to archaeological archiving used by these authorities offer opportunities for the wider use of their processes. From discussions within the workshop it appeared that there was a willingness to learn and for a best practice approach to archaeological archiving to be established for planning archaeologists.

3.2 ALGAO: England members as publically accessible archive repositories

The different approaches taken to archaeological archiving by ALGAO:England members is highlighted by the fact that four organisations (Cambridgeshire County Council, South West Heritage Trust, Suffolk County Council, and Tees Archaeology) act as the primary archaeological, publically accessible archive repository for their area. There appears to be an increasing trend for authorities to consider embarking upon on the storage and curation of archaeological archive as three authorities are currently looking into the possibility that their organisation assumes this responsibility. Four organisations also act as a backstop archaeological archive repositories for smaller projects in their area, although one of these organisations also holds the archive from a national infrastructure scheme.

That ALGAO:England members act as publically accessible archive repositories is a reflection of the organic development of the approaches taken by local authorities in regards to archaeological

archiving. While several of these organisations have been accessioning archaeological archive since the early 1990s, the recent interest of other authorities to follow suit is an interesting development. This appears to be a reflection of concerns regarding the lack of space or capacity of existing repositories in their area. This will be discussed further in sections 4 and 5.1 of this report.

3.3 Local Plans and Strategy Documents

One further area of difference that emerged from the survey results was in regards to Local Plans and heritage strategies. 21 authorities have managed to achieve the inclusion of archaeological archiving within their local plan or heritage strategy. The vast majority of these authorities were unitary. Two-tier authorities appeared to have far fewer successes on the inclusion of archiving within these documents although the majority indicated that they had not attempted to include it. Several unitary authorities demonstrated that the inclusion of archiving within these strategy documents had been very useful. Those where the inclusion of archiving had been most successful tended to be historic cities where there was a clear, longstanding, value placed on the local archaeology. Cross party political support, usually due to the character of the archaeology, was also cited as an important factor.

4. Objective 3: To determine whether the requirements for 'useful' archives in European Guidance are accurately reflected and achievable within national planning policy

The current definition of an archaeological archive as defined by ARCHES is:¹⁰

'An archaeological archive comprises all records and objects recovered during an archaeological project and identified for long term preservation, including artefacts, ecofacts and other environmental remains, waste products, scientific samples and also written and visual documentation in paper, film and digital form.'

In addition to this definition, ARCHES, sets out six core principles for archaeological archives. These principles are:¹¹

- 1) All archaeological projects must result in a stable, ordered, accessible archive.
- 2) It must be recognised that all the processes of an archaeological project affect the quality of the resulting archive.
- 3) Standard and procedures for the creation, selection, management, compilation and transfer of the archive must be agreed and documented in the design of every archaeological project and understood by all project personnel.
- 4) Ensuring the security and stability of the archive is a continuous process and a universal responsibility.
- 5) The entire archive must be compiled in a way that preserves relationships between each element and facilitates access to all parts in the future.
- 6) An archaeological project is not completed until the archive has been transferred to a recognised repository and fully accessible for consultation.

This project defines a 'useful' archive as an archaeological archive that fulfils the above definition, whilst also realising each of the six ARCHES principles throughout the process of creation, deposition and curation. Whilst the NPPF and NPPG lack clear definitions of what constitutes an archaeological archive and make no reference to the above core principles; it is possible to create a 'useful' archive within existing national planning policy, as already occurs in some areas of the country. Therefore, theoretically it is possible for 'useful' archives to be achieved within national planning policy for all parts of the country. However, the production of 'useful' archives has two important influences; accessibility and standards of creation.

4.1 Accessibility issues for 'useful' archives

The reality shown by the results of the Planning for Archives survey and the 2017 SMA survey indicates that 'useful' archives are not currently being produced in all areas of the country due to accessibility and deposition problems. 27.5% of respondents for this projects survey indicated that all or some of the archaeological archives produced in their area is not currently collected. Three of these respondents indicated that 95% or more of the archive produced in their area is not currently collected.

¹⁰ 'A Standard and Guide to Best Practice for Archaeological Archiving in Europe', EAC Guidelines 1, pg. 20: <u>http://archaeologydataservice.ac.uk/arches/attach/The%20Standard%20and%20Guide%20to%20Best%20Practice%20in%20Archaeological%20Archiving%20in%20Europe/ARCHES_V1_GB.pdf</u>

¹¹ 'A Standard and Guide to Best Practice for Archaeological Archiving in Europe', EAC Guidelines 1, pg. 21.

The 26.7% of museums that indicated they do not currently collect archive in SMA 2017 survey¹² is broadly in line with these figures. The results of the SMA survey also highlight the concern of a large number of repositories who expect that they will be unable to continue collecting archives within the next one to five years¹³. As a large amount of archive remains un-deposited with recognised publically accessible repositories, it is clear that these archives are unable to meet point 6 of the ARCHES principles. Therefore, while achievable in some parts of the country, 'useful' archives are not currently achievable nationally until this issue is resolved. A number of related concerns and potential solutions to these issues will be addressed in section 5.1 of this report.

4.2 Standards Issues for 'useful' archives

Discussions during the workshops raised concerns that 'useful' archives are not being created due to poor project planning on the part of contracting units. While this should not be considered the case for all units, a number of planning archaeologists stated that archiving was often considered an afterthought for some units working in their area. Due to this, the preparation of the archive was often underfunded and deposition delayed, even in those areas that regularly accept archive. These delays can lead to problems due to the enforceability of planning conditions being weakened over time. Therefore, proper project planning is required to ensure that archaeological units are producing 'useful' archives. More efforts should be also made by CIFA through their 'Registered Organisation' scheme and their standards and guidance to support proper project planning for archives and archive deposition, where possible, amongst all of their member organisations.

Concerns that some archive repositories currently have no guidelines for archaeological archiving were highlighted throughout the project. Without suitable archive guidelines for receiving institutions there can be no guarantee that ARCHES principles 1, 3, 4 and 5 are being fulfilled. Therefore it is possible that 'useful' archives are not currently being produced in these areas. There were also questions raised during the workshops whether some archive repositories are currently confusing their archive policies with their collecting policies. These issues will be discussed further in section 5.1 of this report.

There are particular aspects within the ARCHES definition where further guidance and awareness is required for planning archaeologists, archive repositories and contracting units. These include storage and curation of environmental remains, scientific samples¹⁴ and digital data¹⁵. Whether 'useful' digital archives are also being produced remains a major concern and will be addressed in section 5.4 of this report.

¹² Museums Collecting Archaeology (England), Report Year 2: November 2017, Pg. 43-45: <u>http://socmusarch.org.uk/socmusarch/gailmark/wordpress/wp-content/uploads/2018/04/HE-SURVEY-2017-FINAL.pdf</u>

¹³ Museums Collecting Archaeology (England), Report Year 2: November 2017, Pg. 42.

¹⁴ The ongoing PhD funded by Historic England 'Palaeoenvironmental Archives: Challenges and Potential' will assist in developing a strategy for dealing with environmental remains and scientific samples and help determine whether current arrangements are suitable.

¹⁵ Further discussion regarding digital archives can be found in section 5.4 of this report. The currently ongoing 'Dig Digital' project should also assist in identifying solutions for issues related to digital archiving.

5. Objective 4: To ascertain blockages to delivering effective archiving through the planning process and to identify potential solutions and areas of improvement in the current process

The project ascertained five key areas that cause blockages to the delivery of effective archaeological archive through the planning process. For each of these areas a number of potential solutions and improvements have been identified to help aid the process and to produce successful archives.

These blockages were listed as:

- Archive repositories, space, staff and standards
- Communication issues between archive repositories and planning archaeologists
- Transfer of Title issues
- Digital archiving
- The use of Briefs, WSIs and PXAs

5.1 Archive repositories, space, staff and standards

5.1.1 Blockages related to archive repositories

As discussed previously in section 4 of this report, over 25% of England currently has areas where no archaeological archive is currently being deposited with many more museums expecting to be unable to accept archive within the next five years. The SMA has identified that the lack of space is the primary factor causing repositories to be unable to accession new archives with the 2017 survey¹⁶ highlighting the second major factor as the lack of staff resources and staff expertise within museums. The declining numbers of staff and level of expertise were also raised as a constant concern by ALGAO:England members throughout the Planning for Archives project.

The project survey identified that archive repositories within 7.8% of ALGAO:England authority areas have no current archiving guidelines. This raises the question as to whether the archives produced in these areas are created to a suitable standard as defined by ARCHES. The lack of archive guidelines within some areas may further be a reflection of the declining numbers of specialist staff. It should however be regarded as a positive that the vast majority of archive repositories do appear to have guidelines, although no comment can be offered on the quality of those guidelines as that is beyond the scope of this project.

The discussions during the workshops identified that for some archive repositories there can be contradiction between the general requirements for an accessible archive (as above) and certain museum collection policies. The workshops highlighted cases where some institutions were not accepting certain objects types due to their collecting polices and discussions raised the prospect of the 'cherry picking' archaeological archives in some areas. This is a significant concern for any archaeological project that is to be undertaken within those areas. This may reflect both a push back from the museum's sector to the assumption that 'all museums should take archaeology' and also that with the cuts numerous museums have experienced, many institutions in line with public sector

¹⁶ Museums Collecting Archaeology (England), Report Year 2: November 2017, Pg. 43-45: <u>http://socmusarch.org.uk/socmusarch/gailmark/wordpress/wp-content/uploads/2018/04/HE-SURVEY-2017-FINAL.pdf</u>

bodies, have been looking critically at all their activities and challenging those not perceived to be part of their core functions.

The SMA survey indicated that for some repositories the issues related to space and staffing is caused due to the lack of funding¹⁷. As a large number of SMA members are local authority museums this should come as no surprise to ALGAO:England members with the number of planning archaeological staff having decreased significantly over the past decade due to declining local government budgets.

5.1.2 Possible solutions for these issues

To solve these potential funding issues for their area, four responding organisations indicated that they have successfully gained section 106¹⁸ monies from large-scale developments within the area to explicitly assist with the facilitation of archaeological archiving. Planning obligations under Section 106 of the Town and Country Planning Act (1990), commonly known as 'section 106 agreements', are a mechanism which make a development proposal acceptable in planning terms, which would not otherwise be acceptable. They are focused on site specific mitigation of the impact of development and along with highway contributions and the Community Infrastructure Levy; section 106 agreements are commonly referred to as 'developer contributions'. A case study stating how one of these organisations; East Sussex County Council managed to achieve this can be found in section 6.4 of this report. A further four local authorities stated that they had secured section 106 funding for museum related activities, although for these authorities it was primarily related to outreach and display opportunities.

Unfortunately, many more organisations indicated that they had been unsuccessful in their attempts in trying to secure section 106 for archaeological archiving. However, the outcomes achieved by these limited number of authorities does indicate that it is both possible and worthwhile for authorities to attempt this as a funding stream for facilitating archaeological archiving. Community Infrastructure Levy (CIL) had been a less successful means of achieving archives funding. Only three organisations managed to have archaeological archiving included in their districts' CIL requirements, but no contributions have understood to have been received as yet. Access to CIL funds can be highly competitive, and not all authorities operate CIL.

As mentioned previously in section 3.2 of this report, several ALGAO:England members are researching the possibility of becoming the archive repositories for their areas as a direct consequence of these blockages. It is clear from the four ALGAO:England members that already act as the archive repository for their area that this is achievable, though it should be stated that it is a significant undertaking for any local authority looking into this possibility. Two of the authorities looking into these possibilities have expressed potential interest in the prospect of joining up to form a regional store. A potential feasibility study looking into the viability of regional and national stores and different storage options may be able to assist in this regard.

A final interesting proposal related to issues of standards that was put forward during the workshops by a representative from a museum was the idea of attaching archaeological archiving to Arts Council museum accreditation. This was in reference to discussion about the conflation of collecting and archive strategies, and would involve a museum clearly committing to archives under its collection policies. As a consequence that museum would follow, and be assessed upon, standards for curation.

¹⁷ Museums Collecting Archaeology (England), Report Year 2: November 2017, Pg. 21-22

¹⁸ The Local Government Association's overview of the planning obligations relating to section 106 of the Town and Country Planning Act 1990 can be found here: <u>https://www.local.gov.uk/pas/pas-</u>topics/infrastructure/s106-obligations-overview

Questions as to how non-museum archive repositories would be factored in, who would administer the system or whether archaeological archive accreditation and museum accreditation should be treated as separate issues, would all need to be addressed. This is beyond the scope of this project, however, it would be worthwhile exploring this prospect as a means to ensuring that all archive repositories are working to an acceptable standard and that archives are ultimately lodged with those repositories that have publically committed to curating them.

5.2 Communication issues between Local Authorities and Archive Repositories/Museums

5.2.1 Blockages related to communication issues

Communication issues between archive repositories and planning archaeologists emerged as an area of concern during the survey and workshops.

The survey results indicated that 67% (34/51) of respondents did not receive notifications from their local archive repository of new archives that were being deposited by archaeological units. This is a concern due to the deposition of an archive being requirement for planning condition. This requirement is clearly stated within the Historic England Good Practice Advice note (GPA 2)¹⁹:

'...deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI'

Therefore, planning archaeologists evidently require knowledge of what archives are being deposited in order to fulfil these standards. Discussions during the workshop highlighted the difficulties of maintaining a planning condition through to the archiving stage for some authorities.

The lack of contact between planning archaeologists and their relevant archive repository was primarily viewed as being a result of a lack of time and capacity from both sides. A lack of archaeological archiving expertise on the side of archive repositories was also stated as a possibly reason for lack of contact in several areas. It was raised that those on both sides were not always aware who their counterpart were.

53% (27/51) of respondents indicated that they had some input in the creation of all or some of their local repository guidelines. However, several comments indicated that this was often when the guidelines were originally created in the 1990s or early 2000s when both the museum and the local authority indicated they had substantially more capacity than now.

5.2.2 Possible solutions for communication issues

There are a number of potential solutions that could address this issue. The forthcoming redevelopment of OASIS as part of HERALD holds the potential to completely transform the way planning archaeologists and archive repositories interact with each other. Each archive repository will have the capacity to have their own page and to manage OASIS records from an archive perspective. They should be able to sign off archives once they have been deposited and thus notify the local authority archaeology team for that area that the archive has been successfully deposited. This has

¹⁹ Historic England's 'The Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning 2'. Pg. 11: <u>https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/gpa2/</u>

the potential to significantly aid both planning archaeologists as they will know the status of archives and archive staff as they will know of potential incoming archives.

A simple but potentially effective solution that was proposed to solve issues of not knowing who an archive/planning archaeologist counterpart is to create a mechanism to match the ALGAO member organisation list and map²⁰ with the Archaeological Collections Areas Database and Map once it has been updated²¹. This could either be produced by simply a link on the ALGAO, ADS and SMA websites or an integrated list that could be regularly updated by users. If clearly signposted, this should have the capacity of significantly helping those that may be new to a role etc.

A number of successful projects aimed at improving communication between archive repositories and planning archaeologists have taken place in recent years. The 'Seeing the Light of Day' project is an excellent example of this where planning archaeologists, museum staff and contractors from across the West Country worked together to solve issues related to archaeological archiving. Similar projects have also been undertaken in recent years at a county level in Gloucestershire²² and Hertfordshire²³. While this can require a substantial investment of staff time, similar approaches can be replicated elsewhere and should be encouraged. Further information about the 'Seeing the Light of Day' can be found in the case study in section 6.5 of this report.

Representatives of the SMA that attended the workshops raised concerns that museums were often not made aware of potential large-scale developments undertaken within their collecting area. These housing and infrastructure developments may lead to large archaeological archives being created that museums are unaware of until late on in the process. The inclusion of museums within the archaeology and cultural heritage section of Environmental Impact Assessments (EIA) was raised as a potential solution for this. As archives from large-scale developments can be an issue for museums to deal with, this should be addressed early on in these projects. As EIAs are a current requirement of EU law, it is likely that developments within the near future may have an influence on whether this is a viable solution.

5.3 Transfer of Title

5.3.1 Blockages related to Transfer of Title issues

Issues related to the successful transfer of ownership or 'Transfer of Title' of an archive from the landowner to the archive repository is an area that causes significant blockages to the delivery of effective archiving. Discussions during the workshops involving planning archaeologists, museum staff and archaeological unit staff indicated that a significant number of projects are unable to be deposited due to the lack of Transfer of Title being secured. The backlog of project archives that remain undeposited due to this issue is a significant concern.

²⁰ <u>https://www.algao.org.uk/membership</u>

²¹ <u>http://archaeologydataservice.ac.uk/archives/view/sma_map/map.cfm</u>

²² Gloucestershire Archaeological Archive Standards 2017:

https://www.archaeologists.net/sites/default/files/Gloucestershire%20Archaeological%20Archive%20Standar ds%20Version%201a%20January%202017.pdf

²³ Hertfordshire Archaeological Archive Standards 2017: <u>https://www.hertfordshire.gov.uk/media-library/documents/environment-and-planning/historical-environment-archaeology/hertfordshire-archaeological-archive-standards-version-1-april-2017.pdf</u>

The survey results for question 'At what stage(s) do you refer to, or expect contractors to address, requirements regarding Transfer of Title for archaeological archives?' indicated no consensus as to the responsibilities over Transfer of Title amongst ALGAO:England members. The results stated:

- 20% (10/51) of responding authorities indicated that they refer to a contractor's responsibility regarding Transfer of Title within their Briefs or specifications issued at the beginning of a project.
- 51% (26/51) of responding authorities stated that they expect contractors to refer to their responsibility to secure Transfer of Title within WSIs before approval.
- 31% (16/51) of responding authorities stated that they expect contractors to refer to their having secured title or their responsibility to secure Transfer of Title within PXAs before approval.
- 35% (18/51)²⁴ of responding authorities indicated that they do not refer to or expect any written reference to Transfer of Title at any point within the archaeological planning process. Several responses stated the view that Transfer of Title was entirely the responsibility of the archive repositories within their area.

During the workshops a representative from the SMA indicated that there is a clear need for more assistance for archive repositories in regards to securing Transfer of Title and that the onus should not solely be on them. Archive repositories are often engaged at the very end of the process and may not receive any support in this regard.

There also appeared to be the need for further guidance on Transfer of Title across the sector and for the clarification of several potential legal issues relating to the following areas:

- The timing of when Transfer of Title can be secured by archaeological contractors. During the workshops several authorities stated their belief that transfer could be gained from the outset of a project, prior to fieldwork taking place while others stated that that transfer should only be secured following the discovery of archaeological material.
- The responsibilities of archaeological consultants to secure Transfer of Title for projects they are involved in. The lack of clarity on this issue was identified as one of the greatest blockages to the delivery of archives by planning archaeologists and representatives of archaeological units who attended the workshops. Significant concern was raised that consultant's involvement with schemes of work often ends prior to the project's completion and almost certainly before an archive is deposited. As consultants act as the primary point of communication between landowner and archaeological unit/archive repository, it often means that these organisations themselves have minimal communication with the landowner. This lack of direct contact, especially when a consultant's involvement in a project has come to an end, was presents a significant difficulty in securing Transfer of Title. It was also highlighted that on projects where consultants were involved, landowners were not always fully aware of their responsibilities over Transfer of Title unless the planning archaeologist had requested an acknowledgement of this at an early stage of the process.
- The status of projects where Transfer of Title was not secured by the archaeological unit at the time the project was undertaken and now has little chance of being secured for reasons

²⁴ This figure combines the number of organisations that stated they have no requirements related to Transfer of Title (14/51) with the number of responses where they stated that they only expect Transfer of Title to be dealt with at the 'archive preparation stage' (4/51). This implies that there is no written reference to Transfer of Title obligations within any of their archaeological planning documents. Therefore, it should be taken as these organisations have no formal requirements.

including; the original landowner having ceased trading, the time elapsed between project end and archive production or a lack of response from the landowner.

• Whether a representative of the landowner can legally sign Transfer of Title.

5.3.2 Possible solutions related to Transfer of Title

There are two mechanisms that emerged from the workshops which may assist with helping with this particular blockage.

The first is that contracting units should be expected to include a statement at the WSI stage referring to the expectation that Transfer of Title will be secured following the completion of the fieldwork. It is understood by some authorities that this creates a commitment within the scheme of work that would be enforceable if required at a later stage. Archaeological units should be made aware that planning archaeologists may be able to assist in securing Transfer of Title, although this is very much dependent upon workloads. Further guidance on the legal standing of this view may be required.

The second recommendation is that for projects that go to a mitigation stage; the signed Transfer of Title document should be required as an appendix within a PXA report, or equivalent document, prior to that reports approval by the planning archaeologist. It was noted that the PXA stage is often a trigger point for funding within projects and therefore at this stage there is an increased likelihood that archaeological units will be in direct contact with the landowner. Furthermore, it should be clear by the PXA stage what the scale of an archive is and therefore exactly what material the landowner is signing over ownership of.

The need for further guidance on Transfer of Title should be addressed in any subsequent best practice documentation in relation to archiving for planning archaeologists. The legal issues and concerns should be clarified by the forthcoming counsel opinion that was commissioned by Historic England relating to issues over Transfer of Title. The results of this counsel opinion should inform any best practice documentation that is to be produced for ALGAO:England following the conclusion of this project. This document should highlight the mechanisms detailed above.

Finally it was noted during the project that a number of archive repositories do not currently have a requirement for Transfer of Title within their current archiving guidelines. It is unclear whether those archive repositories are currently accepting archives without Transfer of Title having been secured. If this is the case then it is a significant concern and could open those institutions up to the major issue of legal ownership.

5.4 Digital archiving

5.4.1 Blockages related to digital archiving

The effective archiving of digital born material is a significant issue that has emerged throughout the project. When compared to physical documentary and material archives, digital born data appears to be given substantially less attention from the sector as a whole. The survey comments and workshop discussions highlighted concern that as archaeological units move further towards digital primary recording methods, this problem will only increase in scale.

From a planning archaeologist perspective the survey of ALGAO:England members stated:

- 49% (25/51) expect all digital archive from archaeological investigations undertaken within their area to be deposited with an accredited digital repository. For 14% (7/51) this was the ADS. For 7.8% (4/51) this was their local archive repository.
- 23.5% (12/51) of responding services stated that they have a mixed approach where some archive were expected to be deposited with and some were not dealt with. The cut off varied by service with some expecting all non-'negative' site archives to be deposited while other only expected archives from large-scale infrastructure schemes to be deposited.
- 23.5% (12/51) of responding services stated that they have no requirements for digital archiving.

These results indicate that a significant amount of fieldwork is undertaken in areas where there is no expectation from the local authority archaeology team that the contracting unit is required to deposit the digital aspect of their archive with an accredited digital repository. The survey results also indicated a misconception as to what constitutes a digital archive. At least two responses stated that the uploading of a report to OASIS was regarded by them as digitally archiving the site. This is a significant concern and highlights that further understanding of what constitutes a digital archive is urgently required. There are also worries over the number of local archive repositories that are still receiving digital archive material. Representatives of the SMA and HE clearly indicated during the workshops that these institutions do not have the capacity to digitally curate this material.

For those authorities who state that they expect digital archiving, a limited number of projects appear to be archived with an accredited digital repository, namely the Archaeology Data Service²⁵. The Archaeology Data Service's (ADS) stated in their 2017-2018 annual report that a total of 424 archives, for projects across c.28 local authorities areas, have been deposited using ADS Easy since its inception in 2013. The past financial year (2017-2018) did see a dramatic rise in number of digital archives released using ADS easy from 80 to 245. However, in only three authority areas have over 50 separate digital archives been deposited using ADS Easy. These figures do not include large-scale infrastructure schemes that are too large to deposit using ADS Easy, however, the ADS have indicated that a very limited number of such projects have been deposited.

When comparing this figure with the number of WSIs approved²⁶ in the recent ALGAO casework surveys then there is cause for major concern. From 2013-2018, an estimated total of c.43000 WSIs²⁷ have been approved by ALGAO England members. While this figure includes projects that were never taken forward to a fieldwork stage or cases where multiple WSIs were submitted, it does suggest that the amount of digital archives deposited with the ADS represents a small percentage of fieldwork undertaken in England from 2013-2018. Of c.43000 that would represent 1% of all projects in the last 5 years. Even if the number of WSIs approved is halved it would represent, at best, 2-3% of all projects undertaken in England within this timeframe.

²⁵ The Archaeology Data Service is currently the only institution working in the United Kingdom that regularly is willing to accept digital born data from archaeological projects that is on the list of certified repositories by CoreTrustSeal. See <u>www.coretrustseal.org</u> for further information.

²⁶ The annual ALGAO survey does not contain statistics on the number of sites where fieldwork actually took place within a calendar year. Therefore the number of WSIs approved is the closest indication of the number of projects actually taking place. The project acknowledges that this is not a perfect indication of the amount of fieldwork taking place within England as not all WSIs approved end in fieldwork. However, these numbers are used to broadly illustrate concern over the number of projects not currently being digitally archived. ²⁷ The ALGAO annual survey results state that c.19000 WSIs have been approved within this time scale. This is

based on a 45% response rate from all ALGAO:England members. Therefore this number has been scaled to represent 100% of all ALGAO:England members. It is recognised however that this is a simplistic measurement.

A similar exercise comparing the number of digital archives deposited with the ADS with the number of OASIS records created within the 2013-2018 timeframe provides a comparable result. Within this time frame c.36000 records have been created by archaeological units on OASIS²⁸. This figure is broadly in line with the number of WSIs approved and suggests only 1.2% of projects where an OASIS record has been created have been archived with a digital repository. For c.34500 of these records the Digital Archive Recipient was marked as either blank or an organisation that does not hold a Core Trust Seal as an accredited digital archive²⁹.

Several possible reasons were put forth to explain these figures during the workshop discussions. The considerable financial cost of true digital archiving was cited as a major factor. For many smaller projects it was indicated that the digital archive would represent a significantly large part of the overall project budget and therefore was not seen as entirely viable by some contracting units. The fact that some archive repositories accept digital archives (even if they do not have the capacity or ability to curate them) at a much lower cost further adds to this problem. It is also possible that misconceptions around digital archiving and the viewpoint that it is not considered a major problem by all may also feed into the low number of projects actually being digitally archived. The final reason cited was the major difficulties planning archaeologists have in tracking whether an archive has been deposited with an accredited digital repository.

5.4.2 Possible solutions for digital archiving

There are a number of methods that planning archaeologists could use to lead to more digital archives being deposited with accredited digital repositories to avoid this large-scale data loss. The workshop discussions identified several areas that could lead to more digital archives being deposited with accredited digital repositories to avoid this loss of data for archaeological projects.

- Contracting units should be expected to state the accredited digital repository where the archive will be deposited within their WSIs. 94% (48/51) of responding services already expect this for the material archive repository. This should be incorporated into any best practice guidance for archiving that is produced by ALGAO:England.
- Contracting units should also be expected to provide a Data Management Plan (DMP)³⁰ from the outset of each project. This should be expected within a WSI prior to approval. The expectation of a DMP at this stage would require archaeological units to address issues over digital metadata, access and security, data sharing, selection of data, resource requirements, staff responsibilities, short term storage and backup, and most importantly for this project long term preservation plans i.e. digital archiving³¹. It would provide evidence that contracting units have thought about and formulated a strategy for their digitally born primary data.

²⁸ Numbers provided to the Planning for Archives project by the ADS for OASIS records created from 2013-2018 period. The project acknowledges that this is not a perfect statistic due to possible duplication in record creation, records created for fieldwork that never took place and the issue that not all ALGAO:England authorities use OASIS.

²⁹ Data entered into this field included deposition of digital archive with the local archive repository, deposition with the local HER, deposition with the client (e.g. a large housing developer), retention by the archaeological unit or consultant and OASIS.

³⁰ For further information on Data Management Plans see the Digital Curation Centre DMP checklist here: <u>http://www.dcc.ac.uk/sites/default/files/documents/resource/DMP/DMP_Checklist_2013.pdf</u>

³¹ Further guidance on Data Management Plans should be forthcoming from Historic England's 'Creating a sectoral standard and guidance for managing digital data generated from archaeological investigations' and

As with communication issues between archive repositories and planning archaeologists, the redevelopment of OASIS through the HERALD project should be able to assist in tracking whether a digital archive has been deposited. It is likely that within the redeveloped OASIS there will be the capacity to link a DOI³² for a digital archive to the records created. A DOI or 'Digital Object Identifier' is a persistent identifier or handle used to uniquely identify digital objects and provide a safe, actionable, interoperable, persistent link often through a URL or web address. DOIs can be issued by any accredited digital repository and therefore this would not be limited to the ADS. This reflects the possibility of potential new digital repositories emerging over the next decade.

It is clear that further guidance for digital archiving is required for planning archaeologists and the sector as a whole. An exact definition as to what constitutes a digital archive for archaeological fieldwork projects should be established. This guidance is expected to be an outcome from the Historic England 'Creating a sectoral standard and guidance for managing digital data generated from archaeological investigations' project. Further guidance on what constitutes an accredited digital archive, what is a Core Trust Seal and why it is important is also crucial. The currently ongoing 'Dig Digital' project is looking at producing further information on these above issues which could be included within any ALGAO:England best practice documentation on archiving.

ALGAO:England should also update its own existing guidance documents to reflect the importance of digital archives. The current ALGAO England advice note 'Advice Note for Post-Excavation Assessment, October 2015' should be updated to refer to the need for PXAs to include information about the accredited digital repository where the digital material will be archived³³. The ADS may also be able to provide a guidance document for ALGAO:England members based upon a similar document produced for members of the Society of Museum Archaeology. This document could be then hosted on the ALGAO UK website.

Finally there is also a requirement within the sector as a whole to acknowledge that digital archives are an integral part of an archaeological project and therefore should be factored in as a cost. This should be considered at the tendering process by archaeological units. If contracting units continue to adapt to technological changes and produce more primary archive as digital born material then attitudes to archiving this material must also adapt. Otherwise there will be an almost catastrophic level of data loss and any researchers of the future will no longer be able to return to the primary records due to poor storage of digital born material.

5.5 Use of Briefs/specifications, WSIs and PXAs

5.5.1 Blockages related to the use of Briefs/specifications, WSIs and PXAs

The range of different uses of documents within the archaeological planning process is primarily discussed in section 3.1 of this report. However, there is the possibility that due to the range of interpretations that this may lead to some blockages to effective archiving.

from the ongoing 'Dig Digital' project. The results of these projects should be included within any future best practice archiving guidance that is produced.

³² For more information about DOIs see here: https://www.doi.org/factsheets/DOIKeyFacts.html ³³ 'Advice Note for Post-Excavation Assessment', ALGAO, 2015: <u>http://eaareports.org.uk/assets/uploads/PXA-ADVICE-NOTE_EAAALGAO_final.pdf</u>

The survey asked ALGAO:England members at what stage or if the following areas were referred to:

- The identification of a repository for archaeological archives
- An acknowledgement of potential costs for archiving
- Transfer of Title
- Use of potential selection strategies
- Unique requirements for archaeological archive (Conservation, Display etc.)
- Estimation of size of archive
- Other claims to material within the archive (e.g. Treasure Act, war graves etc.)

While the majority of areas of archiving were referred to by ALGAO:England members at some point in the process, there were aspects that some authorities did not refer to at any point. This is an obvious concern, though there are potentially reasons why some authorities do not need to some of the aspects e.g. acknowledgement of costs is not required if the archive repository does not charge for deposition.

5.5.2 Possible solutions related to the use of Briefs/specifications, WSIs and PXAs

It was clear from workshop discussions that further guidance was sought and required for ALGAO:England members to clarify their responsibilities for different aspects of archaeological archiving. Therefore, a guidance document on best practice for archiving should be produced for planning archaeologists. This document should include the following issues:

- At what stage of the process different aspects of archiving should be expected to be addressed
- Clarification of responsibilities regarding Transfer of Title
- The inclusion of information about digital archiving and data management plans
- The use of archiving time scales as a way to effectively manage archiving

The existing 'Advice on Post-Excavation Assessment, October 2015' should also be updated to make reference to digital repositories and other claims to material, such as artefacts covered by the Treasure Act³⁴.

³⁴ 'Advice Note for Post-Excavation Assessment', ALGAO, 2015: <u>http://eaareports.org.uk/assets/uploads/PXA-ADVICE-NOTE_EAAALGAO_final.pdf</u>

6. Objective 5: To share best practice of archiving amongst local planning authorities

One aspect of this project was the identify areas of best practice and innovative approaches being taken in regards to archiving by ALGAO:England members. The project has five case study examples that each cover different parts of archiving. It is hoped that other ALGAO:England members will be able to learn and adopt some of the approaches below and that these approaches will be able to inform any future best practice documentation.

The project case studies are:

- Lincolnshire County Council the use of archive timetables
- Devon County Council securing digital archiving
- Cambridgeshire County Council the use of PXAs and communication with units
- East Sussex County Council securing section 106 funding
- South West Local Authorities 'Seeing the Light of Day' project regional collaboration

6.1 Case Study: Lincolnshire County Council (Archive Timetables)

Lincolnshire County Council (LCC) have developed a highly successful system that uses archive timetables as a way to enforce deposition of archaeological archive with the appropriate local archive repository. Their approach highlights the use of archaeological planning documents and the major importance of good communication between those creating archaeological archive and local archive repositories.

LCC sets out the standards of all work within the county in their Archaeological Handbook³⁵. Archaeological contractors are expected to apply for an accession number and deposition window³⁶ following the production of the Brief when they prepare their specification. No specification is approved without these details included. The deposition window acts as a time frame for when units are expected to deposit archives from the projects are undertaking.

At the end of each deposition window the museum repository sends LCC a spreadsheet so that they can approve the discharge of conditions. If an archive is deposited then they accept that it fulfils the condition. If the museum returns the archive because it is not complete or correct then LCC consider this to be a matter between the museum and contractor as it would overly complicate the system. If this window is not going to be met then the expectation is that the contractor will make the museum aware.

The museum produces a spreadsheet annually, showing every outstanding archive, including those that are not overdue. LCC then sends out these lists with a generic letter to contractors. Contractors have been receptive to this as it highlights any errors that can be corrected (e.g. work that never took place) and any archives that have been forgotten. The museum is also sent a copy of these letters. LCC will send a cause for concern letter that is sent to any contracting unit that has not be depositing regularly and built up a large backlog. The units may be asked to provide a schedule of deposition, for

³⁵ Lincolnshire Archaeological Handbook, 2016: <u>https://www.lincolnshire.gov.uk/residents/environment-and-planning/conservation/archaeology/lincolnshire-archaeological-handbook/29200.article</u>

³⁶ In order for the museum to manage their time efficiently, they only accept depositions for one week every two months. Contracting units are expected to book in with the museum a time to deposit.

example this could be to deposit eight archives in each window to bring down a backlog of completed archive.

If the contractor does not provide this, then LCC may go down the line of putting the contractor into abeyance. This happens very rarely as since the system has started they have worked hard with contractors to ensure that archives are deposited. There are currently three contractors that LCC will not accept specifications from due to the non-deposition of archive. LCC will resend the letter each year to invite the unit to commit to a schedule of deposition that after compliance will allow them to work within the county again.

There was little resistance to the system when it was implemented and for the first few years officers took a light touch before challenging those contractors who had never deposited. They have also had very few complaints about this process or the standards set out in their Archaeological Handbook. They have also received anecdotal evidence that contractors like knowing there is a level playing field and that they are all expected to do the same thing.

6.2 Case Study: Devon County Council (Digital Archiving)

Devon County Council is currently the most successful authority in England for digital archives being deposited with the ADS. 23% of all digital archives deposited with the ADS using ADS Easy have come from Devon.

Their move to the requirement for creating a digital archive was undertaken in liaison with the ADS and the museums that collect archaeological archives for their area. With space at a premium officers agreed with the use of the ADS for the digital archive, consisting of the born-digital data and digital copies of the hardcopy records such as context sheets, etc. They tested the approach and the cost comparisons of the type of work typical of their region determined that the cost of the creation of a digital archive was comparable with the creation of a traditional hardcopy archive for the site.

The authority changed specifications³⁷ for archaeological work in 2013 to include this requirement following consultations with contractors and museums. The contractors' main concern was that it should be a level playing field since there was a cost implication for the creation and deposition of a digital archive. The requirement for digital archiving was not applied retrospectively but from the date of the revision to the specification.

New WSIs since this date are required to set out the provision of digital archiving. The implementation of the WSI is key and contractors are expected to obtain an OASIS entry reference and quote it on the WSI. This is taken as evidence that the contractor has started engagement with the ADS for the project. Officers also add deadlines in the WSI for reporting and deposition of the digital archive and can enforce non-compliance if required. If a delay is expect then contractors can agree an extension. If contractors are subsequently unable to implement the WSI, then the Devon HET can liaise with the Local Planning Authority (LPA) with regard to enforcement.

WSIs for geophysical surveys in Devon are also expected to append a quotation from the ADS for the archiving of data generated by the survey. This ensures that the contractor is engaging with the digital archiving process and again creates a level playing field as they all have to obtain a quotation for digital archiving and include that in their overarching quote to their client. Officers determined this would

³⁷ Devon County Council's regularly updated specifications can be found on their website: <u>https://new.devon.gov.uk/historicenvironment/development-management/specifications/</u>

not be possible for intrusive projects due to the impossibility of measuring the amount of material to be found.

Tracking whether archives are being deposited involves time, effort and input from the Devon HET. Officers actively liaise with the ADS to monitor the deposition of digital archive for projects, tracking whether the material has been deposited. Devon HET discharge conditions with the formal acceptance of the WSI. Officers would not sign off on a project until there are assurances from the contractor that resources and funding are available to create and deposit the full archive, including this vital digital aspect. Once this assurance has been gained they will let the LPA know that the WSI has been implement and the condition can be discharged.

Devon HET's experience is that once contracting units begin this process it can quickly become standard practice. However, they highlight that communication between all parties involved is crucial. They expect that the upcoming redevelopment of HERALD will significantly streamline their process and make it easier to track the deposition of digital archives.

6.3 Case study: Cambridgeshire County Council (Use of PXAs)

Cambridgeshire County Council Historic Environment Team (CCC HET) are able to actively manage the archiving process, from the beginning of the development control process through to deposition as they are also the archive repository for the county. The planning archaeologists and the archive curatorial staff sit within the same team, allowing them to be able to monitor and influence all aspects of archaeological archiving throughout the planning process. As a safe and cost effective solution to securing space for incoming archives, Cambridgeshire now operates an off-site store arrangement for its archives.

An example of the close working relationship between archive staff and planning archaeologists is the production of the 'Archaeological Archives Requirements for Post Excavation Analysis (PXAs)' document in 2017³⁸. This document was established through discussions involving all members of the team to ensure that everything was covered. This document explicitly states the expectations that the planning archaeologists for Cambridgeshire have for PXAs that they receive from archaeological contractors working within their authority area. This document is also referred to in the Briefs that the planning archaeologists issue for mitigation work in Cambridgeshire.

As the archaeological archive repository for Cambridgeshire, CHET also has its own set archive guidelines 'Deposition of archaeological archives in Cambridgeshire'³⁹. Within this document the section 'Checklist of expectations from contractors' further details what is expected for the WSI, project stage and PXA stage for all units working within the county.

As part of the consultation for both the PXA document and the original archive guidelines from 2014, managers, project officers and archive officers from 18 units who regularly work within the county were invited to workshops. The intention of these workshops was to ensure that the planning archaeologists and archive team at CHET were not setting unreal expectations of the contracting units working within the county and to ensure that all parties were on the same page.

³⁸ Cambridgeshire Archaeological Archives Requirements for Post Excavation Analysis (PXAs), 2017: <u>https://www.cambridgeshire.gov.uk/archaeology/PXArequirements</u>

³⁹ Deposition of archaeological archives in Cambridgeshire, 2017: <u>https://www.cambridgeshire.gov.uk/archaeology/archiveguidelines</u>

6.4 Case study: East Sussex County Council (section 106)

The Archaeology team at East Sussex County Council successfully secured section 106 funding exclusively for the use of archaeological archives with two of their seven District authorities.

The first scheme of work where section 106 funding was secured for archaeological archiving is a housing development within Eastbourne Borough where there was an expectation that the particular site in question would produce significant levels of archaeology. A memorandum of understanding was established for the need of investment in the existing museum, Heritage Eastbourne, was entered into with the developer. The developer agreed with this cultural need and was bound into a statement of common ground outlining the requirement for archaeological archiving along with public engagement, outreach, museum display and a higher level than normal of mitigation for the project.

The second and third schemes are two adjacent housing developments within Rother District. The planners from this district agreed that the approach in Eastbourne Borough had been successful. There was a recognition from all involved of the pressure that new housing development and rising population volumes have on existing cultural infrastructure⁴⁰. Therefore, the developers were required through a section 106 agreement to pay for the local museum to have the infrastructure in place to store, curate and communicate the archaeological archives resulting from their developments. The cost was calculated at £95 per house which was to cover all of the museum's needs. The museum itself was only tangentially involved and the cost was calculated by the two developers and the Chief Planner for the district. This funding is intended to allow for the infrastructure, for storage to be in place to allow the receipt of the subsequent archive with the additional box charge. These projects are still ongoing, although the figure of c. £200,000 has been secured from one of the schemes.

East Sussex has found that developers have been supportive for the further use of section 106 money to support cultural infrastructure (which would include archaeological archiving). They have understood the impact of their development, the added value of heritage and the good public relations implications of supporting local heritage organisations. However, they have found resistance from the planners within the five district councils they have not yet gained section 106 funding within. This has also been the case for the inclusion of archaeological archiving within all but one of their districts CIL requirements.

6.5 Case Study: Seeing the Light of Day Partnership Project (South West Local Authorities Collaborative Project)

The 'Seeing the Light of Day project' is an excellent example of a collaborative project undertaken to develop sustainable solutions for managing the preservation of and long-term accessibility of archaeological archive in the English South West region. The project was funded by Arts Council England and was a partnership project led by Wiltshire Museum in Devizes. Partners included planning archaeologists (from ALGAO:England member organisations), HE, ClfA, SMA, museum organisations and the five largest contracting units active in the region.

⁴⁰ The NPPF explicitly states that strategic policies for developments should make sufficient provision for community facilities. Cultural infrastructure is included within the text as an example of a community facility along with health and education. Section 3. Plan-making, paragraph 20, point C:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/ National Planning Policy Framework web accessible version.pdf

A consultation with the planning archaeologists in the region was undertaken in the spring of 2017. The project received a total of 19 responses from 16 ALGAO:England member authorities. Similar efforts were carried out to gain the perspective of museums and archaeological contractors within the region. Nearly a quarter (22%) of museums in the region were not in a position to receive archaeological archives and the majority that were, expected to be full to capacity within 2-6 years. There was also a considerable backlog of archaeological archive for the region being held by archaeological units that had produced them.

Following these consultations, a workshop took place in May 2017 that brought together planning archaeologists, archaeological contractors and museum staff to discuss WSIs, storage, digital archives, workflow and public engagement. 'Seeing the Light of Day' project participants who attended this project's workshops noted that simply having many of the different stakeholders across the region in the same room was an important step in the right direction.

The project recommendations, based on the consultation and subsequent workshop discussions can be found in the project Summary Report⁴¹. The project recommendations included:

- A standard framework on archaeological archives to be in all Briefs and WSIs for the region, including a requirement for the deposition of digital archive with the ADS.
- Recommendations for new models of communications between all stakeholders. The HERALD project and redevelopment of OASIS was identified as a good opportunity for this.
- Development of new funding, charging and business models for sustainable archives.

⁴¹ Seeing the Light of Day: Securing a sustainable future of archaeological archives, Summary Report, 2017: <u>https://seeingthelightofday.files.wordpress.com/2017/10/summary-report-seeing-the-light-of-day-2017-10-</u> <u>26.pdf</u>

7. Final Recommendations

A number of key recommendations have been identified that should be developed further as a result of the evidence produced by this project:

7.1 Tier 2 and Tier 3 guidance documentation

- The inclusion of a definition of 'publicly accessible archive repository' within the NPPG and the Historic England 'The Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning 2' supporting documentation. The definition produced by the SMA suitably covers this and could be usefully endorsed/publicised by Historic England.
- The inclusion of a definition of 'archaeological archive' within NPPG and Historic England 'The Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning 2' supporting documentation. The current ARCHES definition suitably covers this and could be usefully endorsed/publicised by Historic England.
- ALGAO:England has been made aware that a review of the NPPG is pending to reflect recent revisions to the NPPF. Sector representations are being channelled through the Historic Environment Forum and this could be strengthened, especially with the support of Historic England.

7.2 To share best practice

- ALGAO:England create a best practice documentation about archiving for planning archaeologists. This documentation should include:
 - \circ $\;$ At what stage of the process different aspects of archiving should be expected to be addressed.
 - Clarification of responsibilities regarding Transfer of Title.
 - The inclusion of information about digital archiving and Data Management Plans.
 - The use of archiving time scales as a way to effectively manage archiving.
- The current ALGAO:England 'Advice on Post-Excavation Assessment, October 2015' document to be updated based upon the findings of this project.
- Counsel's opinion regarding Transfer of Title should be disseminated widely following conclusion. This should inform any best practice documentation produced within the archaeology sector.

7.3 Digital archive

- A definition of what constitutes a digital archaeological archive is required. It is anticipated that the Historic England Project 'Dig Digital' that is currently being undertaken will provide further clarity on this definition.
- Data Management Plans should be promoted as best practice across the archaeology sector. These documents should help organisations to fully understand their responsibilities for digital born data and ensure they put a suitable archive strategy in place for their data.
- Definition of a digital archive and the importance of a Core Trust Seal is disseminated across the archaeology sector.
- The ADS to provide a guidance document for digital archiving based upon similar documentation produced for the SMA. It is also anticipated that one of the outcomes of the 'Dig Digital' project is digital archive guidance documentation.

7.4 To improve communication

- The ALGAO:England members list and map should be linked with the SMA collecting areas map once it has been updated.
- The HERALD project should be supported by all stakeholders involved with archaeological archiving. The results of this project could produce mechanisms that would transform the way ALGAO:England members could interact with archive repositories.

7.5 Other

- Proposed idea of linking archiving to museum accreditation, or the creation of a separate accreditation scheme for archaeological archives, should be investigated by a future project.
- Further guidance on selection strategies is to be produced.

8. Post Project evaluation plan

The project achieved the aims stated in the Project Design and was successful in gaining an overview of the approach a majority of ALGAO:England members take towards archaeological archiving. While the 60% survey response rate was not as high as the 75-80% response rate that was initially hoped for in the project design; it does represent a comparable number to response rate to the archive questions during the annual ALGAO staffing and casework survey. A number of other surveys were open during the same time frame and could have contributed to 'survey fatigue' for some organisations. It may also reflect a lack of awareness or interest in archaeological archiving by some ALGAO:England members or a lack of capacity to engage due to workloads or expertise.

It is important to acknowledge that there may have been problems with submission of surveys through the SurveyMonkey website. The project is aware of at least three authorities that unsuccessfully submitted their survey answers as a result of an error on the website. These surveys were subsequently received by other means, however, there remains a possibility that other responses were lost due to this.

The project workshops were highly successful. They were attended by representatives from 30.5% of all ALGAO:England member organisations. They generated valuable discussions, highlighted several case studies to share in the final report and helped shape the final recommendations. The insights provided by representatives of the contracting archaeology and museum worlds during the workshops were also extremely valuable.

Due to the success of the workshops in London and York, a third workshop was undertaken in Bristol. The additional workshop in Bristol was extremely important in boosting the number of responses from the South West region where the number had previously been significantly lower. The project found that hosting workshops within the different regions of England, rather solely in London, was extremely important in gaining a full understanding for the country. For example the workshop in York gave a real insight into the archive situation on the north eastern side of the country with most ALGAO:England member authorities located between Lincolnshire and Northumberland being represented during discussions. Going forward, any future projects aimed at ALGAO:England members should consider this point when arranging discussion workshops. The additional workshop meant that the submission date of the final report was extended from October to December 2018. This will not impact the other aspects of the project.

The project results identified that selection strategies are an area where ALGAO:England members felt there was need for greater guidance. This was beyond the scope of this project but is worth acknowledging for any future project. It is hoped that the ongoing Selection Toolkit for Archaeological Archives project may be able to assist considerably in this area.

The project's quality assurance procedures were sufficient throughout the project as it achieved its stated aims. The team was sufficiently skilled for creating the survey, conducting the workshop discussions, collating data, undertaking research and writing the highlight and end of project reports. The risk strategies in place were successfully implemented. This is reflected by the fact that the project lead was promoted during the project and therefore the project support were required to devote more time to the report writing stage.

Finally, it is important to highlight that this is not an isolated project and there are a number of funded projects, some of which have been referenced in this report, that are currently being undertaken or have recently been completed which look to solve issues over different aspects of archaeological archiving.

These projects are as followed:

- HERALD and the re-development of OASIS by the Archaeology Data Service⁴²
- The Society of Museum Archaeology 'Annual Survey of Museums Collecting Archaeology' commissioned by Historic England⁴³.
- The Society of Museum Archaeology 'Guidance on the Rationalisation of Museum Archaeology Collections' project which has been completed⁴⁴.
- The Chartered Institute for Archaeologist's 'Developing a Selection Toolkit for Archaeological Archives' project.
- The Archaeological Archives Forum 'Negative' Archives Project
- The Archaeological Archives Forum 'Security Copying of Archives' Project
- The 'Dig Digital' project undertaken by DigVentures and funded by Historic England
- The 'A Survey of Museum Charging for the Transfer of Archaeological Archives in England' project undertaken by Swindon Museum and funded by Historic England.
- The PhD looking at 'Palaeoenvironmental Archives: Challenges and Potential' funded by Historic England

Each of these projects is looking at a specific aspect of archaeological archiving. Together the findings of these project should be supported by all stakeholders and individuals involved with archaeological archiving. It is hoped that this combined work should aid in the development of a sustainable future for archaeological archives.

Product	Purpose	Format	Planned Completion Date
Sector Briefing Notes	To ensure results of project are fully disseminated to sector colleagues	Downloadable and printable files	Jan/Feb 2019
Training/CPD Package and Online Training	To ensure LPA archaeological advisers are fully trained and aware of options and requirements	Formal learning environment with members and speakers; guided training and downloadable materials	Feb/March 2019
Best practice documentation for planning and archives for ALGAO:England	To ensure that best practice that has been identified during this project and other concurrent projects is shared amongst ALGAO:England members	Downloadable and printable files	Feb/March 2019

Table 2: Project Forward Plan

⁴² Recent developments for the HERALD project can be viewed through the OASIS blog: <u>http://archaeologydataservice.ac.uk/blog/oasis/</u>

⁴³ Reports can be found here: <u>http://socmusarch.org.uk/projects/hesma-annual-survey-of-museums-</u> <u>collecting-archaeology-reports/</u>

⁴⁴ Final Report can be found here: <u>http://socmusarch.org.uk/projects/guidance-on-the-rationalisation-of-</u> museum-archaeology-collections/

9. Acknowledgements

The project team would like to thank Historic England for funding the project. We would also like to thank all from the staff from the ALGAO:England member organisations that participated in the project by completing the survey, attending the workshops and for their useful thoughts and insights into issues related to archaeological archives and planning throughout the project.

Thanks also goes to representatives of Historic England, the Archaeology Data Service the Society of Museum Archaeology, the Chartered Institute for Archaeologists, the Federation of Archaeological Managers and Employers, RESCUE and the Seeing the Light of Day Partnership Project for attending our workshops and lending their time and expertise to the project.

A special thanks goes to those organisations and projects that allowed us to use their successful approaches to archiving as case studies so that other ALGAO:England members can learn from them.

Finally we would like to offer our gratitude to Alex Llewellyn, Gail Boyle and Stephen Reed for organisational assistance and Katie Green for providing the statistics for digital archiving that were discussed in this report.


Figure 1: Map of survey respondents.

Red = Survey respondent White = non-response Grey = Non ALGAO:England member/no staff in post throughout the duration of the project

Table 3: List of ALGAO:England member authorities and their authority type that responded to the survey.

survey. Authority Name	Authority Type
Bedford Borough	Borough/Unitary
Berkshire Archaeology	Borough/Unitary
Bristol City Council	Borough/Unitary
Central Bedfordshire Council	Borough/Unitary
Cheshire Archaeology Planning service	Borough/Unitary
City of York Council	Borough/Unitary
Colchester Borough Council	Borough/Unitary
Cornwall County Council	Borough/Unitary
Coventry City Council	Borough/Unitary
Durham County Council	Borough/Unitary
Greater London Archaeological Advisory Service	Borough/Unitary
Herefordshire Council	Borough/Unitary
Leicester City Council	Borough/Unitary
Northumberland County Council	Borough/Unitary
North Somerset Council	Borough/Unitary
Peterborough City Council	Borough/Unitary
Oxford City Council	Borough/Unitary
Southampton City Council	Borough/Unitary
Southwark Council	Borough/Unitary
South Yorkshire Archaeology Service	Borough/Unitary
Tees Archaeology	Borough/Unitary
Tyne and Wear Archaeology Service	Borough/Unitary
West Berkshire Council	Borough/Unitary
West Yorkshire Archaeological Advisory Service	Borough/Unitary
Winchester City Council	Borough/Unitary
Worcester City Council	Borough/Unitary
Buckinghamshire County Council	County
Cambridgeshire County Council	County
Cumbria County Council	County
Devon County Council	County
East Sussex County Council	County
Gloucestershire County Council	County
Hertfordshire County Council	County
Kent County Council	County
Lincolnshire County Council	County
Norfolk County Council	County
North Yorkshire County Council	County
Northamptonshire County Council	County
Nottinghamshire County Council	County

Oxfordshire County Council	County
South West Heritage Trust	County
Staffordshire County Council	County
Suffolk County Council	County
Surrey County Council	County
Warwickshire County Council	County
Wiltshire County Council	County
Worcestershire County Council	County
St Albans District Council	District
New Forest National Park/New Forest District Council	National Park Authority
Northumberland National Park Authority	National Park Authority
Peak District National Park Authority	National Park Authority



Figure 2: Map of workshop attendees.

Purple = Attended multiple workshops Blue = Attended London workshop Orange = Attended York workshop Green = Attended Bristol workshop

Authority Name	Workshop attended
Cambridgeshire County Council	London/York/Bristol
Colchester Borough Council	London
Devon County Council	London/Bristol
Greater London Archaeological Advisory Service	London
Hertfordshire County Council	London
Kent County Council	London
Leicestershire County Council	London
Worcestershire County Council	London
Newcastle City Council	York
City of York Council	York
Durham County Council	York
Lincolnshire County Council	York
Newcastle City Council	York
North Yorkshire County Council	York
Northumberland County Council	York
West Yorkshire Archaeology Advisory Service	York
Worcester City Council	York
Bristol City Council	Bristol
Cornwall County Council	Bristol
Exeter City Council	Bristol
Gloucester City Council	Bristol
Gloucestershire County Council	Bristol
North Somerset Council	Bristol
South West Heritage Trust	Bristol
Warwickshire County Council	Bristol
West Berkshire Council	Bristol

Table 4: List of workshop attendees and the workshop they attended.

Appendix 1: Survey Questionnaire sent to ALGAO:England members.

General Questions:

1 Name of Service and ALGAO member Local Authority or Authorities

2 Does your service collect archaeological archives for all or some of your area?

- Yes (all)
- Yes (some) (Please give details)
- No

3 How many individual museum/archaeological archive repository collecting areas fall within your county/district/unitary authority area?

4 Are there any areas within your authority where no archaeological archives are regularly being collected for curation? "Regularly" is taken here to mean will accept all archives prepared to a standard without selection

- Yes
- Don't Know
- No

If Yes, what % of the archaeological projects undertaken in the past three years fall within one of these areas? If this information is not readily available, please provide an estimate.

5 Is anyone within your service aware of any of the following archive standards?

- <u>CIFA, Standard and guidance for the creation, compilation, transfer and deposition of</u> <u>archaeological archives</u>
- ARCHES, A standard and guide to best practice for archaeological archiving in Europe
- <u>Archaeological Archives Forum, Archaeological Archives, A guide to best practice in</u> <u>creation, compilation, transfer and curation</u>
- Other (please specify) ______

6 Does each repository within your area have their own archiving guidelines or shared archiving guidelines? Please select all that apply.

- All repositories within my area have a shared set of guidelines
- Some repositories within my area have a shared set of guidelines (please specify number of repositories below)
- All repositories within my area use their own individual guidelines
- Some repositories within my area use their own individual guidelines (please specify number of repositories below)
- No repositories within my area have published guidelines
- Some repositories within my area have no published guidelines (please specify number of repositories below)
- Don't know

Number of repositories _____

7 Did your service have any input in the creation of these guidelines?

- Yes
- No
- N/A
- Not sure

8 Do you receive regular notifications from the repositories of the archives they have received?

- Yes
- No
- N/A (We curate archives for our area)

High level Strategy

9 Are archaeological archives specifically mentioned within your local plan, or any other policy/strategy document relating to the historic environment?

- Yes
- No

10 If Yes, please provide links or an example of the text.

11 If no, why are archaeological archives not referred to?

- Did not try to include archaeological archives.
- Tried to include archaeological archives but was unsuccessful.

12 Are archaeological archives referenced within your areas CIL (Community Infrastructure Levy) requirements?

- Yes
- No

13 If Yes, please provide examples and a short summary of how you justified this.

14 If no, why are archaeological archives not referenced?

- Did not try to include archaeological archives.
- Tried to include archaeological archives but was unsuccessful

15 Has your service ever secured section 106 funding for an aspect of archaeological archiving?

- Yes
- No

If yes, please would you be able to provide a brief summary?

16 If yes for any or all of Questions 9, 12 and 15, from what organisations did you take advice from regarding archaeological archives?

- Museums
- Historic England
- Other (Please specify) _____
- No advice sought

Project Stage

For questions 17 to 23 please select all stages that apply.

17 At what stage(s) do you refer to, or expect contractors to address, requirements regarding the identification of a repository for archaeological archives?

- Pre-Application stage
- Archaeological Brief
- Written Scheme of Investigation (WSI)
- Post Excavation Assessment (PXA)
- Updated Project Design (UPD)
- Archive Report/Final report
- Archive preparation stage
- Do not refer to or specify
- Other (please specify) _____

18 At what stage(s) do you refer to, or expect contractors to address, requirements regarding Transfer of Title for archaeological archives?

- Pre-Application stage
- Brief
- WSI
- PXA
- UPD
- Archive Report/Final report
- Archive preparation stage
- Do not refer to or specify
- Other (please specify) ______

19 At what stage(s) do you refer to, or expect contractors to address, requirements regarding an acknowledgement of the potential costs of archaeological archiving?

- Pre-Application stage
- Brief
- WSI
- PXA
- UPD
- Archive Report/Final report
- Archive preparation stage
- Do not refer to or specify
- Other (please specify) _____

20 At what stage(s) do you refer to, or expect contractors to address, requirements regarding potential retention strategies for archaeological archive created within your area?

- Pre-Application stage
- Brief
- WSI
- PXA
- UPD
- Archive Report/Final report
- Archive preparation stage
- Do not refer to or specify
- Other (please specify) _____

21 At what stage(s) do you refer to, or expect contractors to address, requirements regarding any unique requirements for a sites archaeological archive? Eg. Conservation needs, display potential etc.

- Pre-Application stage
- Brief
- WSI
- PXA
- UPD
- Archive Report/Final report
- Archive preparation stage
- Do not refer to or specify
- Other (please specify) _____

22 At what stage(s) do you refer to, or expect contractors to address, requirements regarding an estimation of the size of an archaeological archive?

- Pre-Application stage
- Brief
- WSI
- PXA
- UPD
- Archive Report/Final report
- Archive preparation stage
- Do not refer to or specify
- Other (please specify) ______

23 At what stage(s) do you refer to, or expect contractors to address, any requirements regarding any other claims to the material within an archive? Eg. Treasure Act, war graves, re-burial of human remains, landowner refusal, landowner desire to retain selected elements?

- Pre-Application stage
- Brief
- WSI
- PXA
- UPD
- Archive Report/Final report
- Archive preparation stage
- Do not refer to or specify
- Other (please specify) ______

24 What are your requirements for digital archiving?

- Contractors are required to deposit all digital archive with an accredited digital repository (please specify which repository)
- Mixed approach, for example a selective approach where some digital material is sent to an accredited digital repository and some digital material is dealt with locally or is not archived (Please give details)
- No requirements for digital archiving

Please add repository/more details here:

25 Has your service gained a legal opinion (external or from your organisations own legal department) regarding any aspect of archaeological archives within the planning process? Possible examples would be involving the primacy of Briefs or WSIs within the planning process, aspects of Transfer of Title or enforceability etc.

- Yes
- No

If Yes, please would you be able to provide a brief summary of the opinion(s) provided?

26 Has your service ever used enforcement powers to secure the archaeological archiving process for a site?

- Yes
- No

If Yes, please would you be able to provide a brief explanation.

27 Do you have any further thoughts, comments or ideas for improving the archaeological archiving process?

28 The project is looking to arrange workshops to discuss the results of this survey. Would you like to attend?

- Yes
- No

Many thanks for completing this survey.