

Ensuring Archaeology in the Planning System Delivers Public Benefit

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Archaeologists in the UK work in a variety of structures, but all archaeology is for the benefit of the public. Since 1990 the majority of archaeological work has been undertaken as part of the planning process. A complex system has evolved which attempts to deliver wider public benefit. There are differences between England, Scotland, Wales and Northern Ireland, but the underlying principles are broadly the same across the UK.

In 2020 radical changes were proposed to the planning system in England which could potentially impact on both the archaeological profession and the public benefits it generates. This paper outlines the evolution and operation of the current UK system with particular reference to England, and highlights some changes that the new proposals could make to the status quo. Some structural issues are highlighted which will need to be overcome for archaeologists to improve things for themselves and for the society they serve in the future.

KEYWORDS planning, development, public benefit, mitigation, archaeology, professionalism, heritage

Introduction

Archaeology is a set of approaches and techniques for exploring the material culture of past societies. Understanding the past is firmly rooted in the present, and archaeology long ago escaped from the ‘insulated interconnecting enclosures of state patronage and academia’ (Ascherson, 2006: 50) into the real world of land management, place-making, spatial planning, and development. Most archaeology in the UK today is undertaken within the planning system, and archaeological practice has moved from enabling compliance with ‘polluter pays’ regulations towards more partnership-based approaches that attempt to deliver wider public benefit. The term ‘public benefit’ can be defined narrowly, as in charity law — although even here the public benefit requirement implies that all charities are accountable to the wider public — or more widely to describe positive social, cultural, and environmental impacts deriving from an activity. This paper will adopt the latter definition, in which ‘archaeologists create and deliver public benefit’ through

gaining knowledge and understanding, and sharing it in an accessible way to the diverse general public (CIfA, 2020d).

The mechanisms in the UK that enable archaeological endeavour through the planning system have similar origins. However, planning in the UK is best described as a set of systems, as both planning and cultural heritage management are devolved matters, and approaches in Wales, Scotland, Northern Ireland, and England have diverged — before and because of devolution; some differences are discussed below. Overall, these systems are transparent and accountable: consideration of archaeology, cultural heritage, historic buildings, landscapes, settings, and other ‘historic environment’ assets is a well-understood component in a wider suite of environmental management tools. Arrangements are not perfect: there may be real and perceived conflicts of interest; reduced public sector funding has impacted on decision-making and enforcement, consequently development-driven ‘commercial’ archaeology does not always deliver the public benefits which it sometimes claims (Booth, 2020; Rocks-Macqueen & Lewis, 2019; Sandford, 2016). Nevertheless, these systems provide a series of processes to balance benefit and harm to local places, local communities, and archaeology without impeding development.

Significant changes to planning policy in England were proposed in August 2020 (MHCLG, 2020a; 2020b). These appear to threaten some existing safeguards for archaeology and the historic environment, and so reduce the public benefit derived from archaeological activity. The intention was to ‘cut red tape’ (Jenrick, 2020), because, as the Prime Minister put it: ‘time is money, and the newt-counting delays in our system are a massive drag on the productivity and the prosperity of this country’ (Johnson, 2020). Streamlining the development process in this way has caused concern for many historic environment professionals, who have pointed out the social and economic benefits that archaeology delivers (CIfA, 2020b). This paper examines the evolution of planning-led archaeology, assesses the potential impact of some aspects of the 2020 White Paper, and considers broader issues for archaeology and archaeologists — in England and across the UK.

Evolution and operation of the current system

The delivery of archaeological research through spatial planning makes a positive contribution to the economy. The UK archaeological sector is worth £258 m per year, and development-driven archaeology directly supports around 5,300 jobs (approximately four-fifths of all archaeological employment); 73% of its funding comes directly from the private sector, and 34% of turnover is related to house-building (Aitchison & Rocks-Macqueen, 2020). Archaeologists delivering local government planning services across the UK save the construction industry £1.3bn per year through reduced delay costs alone — these savings are made because the system addresses archaeological impacts before construction rather than reacting to discoveries during construction; these services are worth up to £245 m per year in savings to the public purse (Rocks-Macqueen & Lewis, 2019: 33–41). These figures are impressive, but economics is not everything. Archaeology can also deliver wider public benefits which are arguably more important for the well-being of individuals and society, and for long-term conservation and environmental sustainability.

Planning, archaeology and the historic environment

The UK spatial planning system is a way of controlling a finite amount of land, ensuring that what is built meets the needs of local populations. The system originated in the 1940s, emerging from the ‘Garden Cities’ movement of the late nineteenth century (Boughton, 2018: 61–68). Planning was seen as a driver for rebuilding society after the devastation of aerial bombardment in the 1940s. Indeed, planning stood alongside the National Health Service as one of the mechanisms for tackling the five ‘giants’ of the 1942 Beveridge Report: squalor, ignorance, war, idleness, and disease (Abel-Smith, 1992; Ellis, 2017). The 1940 Barlow Report identified planning as a tool for rebalancing regional growth; Abercrombie’s influential 1943 County of London Plan introduced the concepts of green belts and community-based planning (Dehaene, 2004: 18–25; Ray, et al., 2018: 269–71). These ideas came together in a suite of post-war legislation which included the New Towns Act (1946), the National Parks and Access to the Countryside Act (1949), and the Town and Country Planning Act (1947).

The 1947 Act effectively nationalized development rights, placing the power to control development in the hands of ordinary people through their local authorities: it arguably created ‘the biggest shift in power between landowning interest and ordinary citizen in British history’ (Ellis, 2017). However, the 1947 Act has not been a monolithic unchanging entity. Some key tenets were quickly dismantled: the Ministry of Town and Country Planning’s regional offices were closed in 1951, and the ‘development charge’ — a 100% tax on the increased value of development land — was abolished in 1954 (Ray, et al., 2018: 272). Since then the planning system has undergone major reforms during the 1960s and 1970s, in the early 1990s, in the early 2000s, and again in 2010–12. Minor revisions take place all the time: it has been said that ‘review and reform are constant features of the English planning system’ (Nadin, 2007: 44).

Not all development is managed through the planning system. Exceptions are very large or very small projects. Major transport infrastructure always required separate Acts of Parliament, and since 2008 all nationally significant infrastructure projects (NSIPs) — including energy and water management as well as transport — require a special Development Consent Order. These projects are delivered through the National Infrastructure Commission, with different approaches across the UK depending on the competencies of the devolved administrations (NIC, 2018). At the other end of the scale there are long-standing ‘permitted development rights’ — that is, types of development that can take place without planning permission. These are still subject to building controls and environmental regulations, and are more restricted in some designated areas.

Nevertheless, most decisions about what can be built where, and by whom, are made by local planning authorities (LPAs), which are usually a department of the local government administration (known in the UK as councils).¹ National Parks also operate as planning authorities, and the Mayor of London and some other regional mayors in England also have planning powers, especially in relation to infrastructure. LPAs are required to produce Local Plans, which create frameworks within which these decisions are made.² These take into account projected population growth and demographics to ensure that the right numbers of houses,

schools, and shops are being built to serve the local population; at the same time Local Plans balance the need for development against the impact on the environment (in its broadest sense) both now and in the future. Local Plans are required to be consistent with the National Planning Policy Framework (NPPF), which ‘sets out the Government’s planning policies for England and how these should be applied’ (MHCLG, 2019: 4). Together the NPPF and Local Plans provide a structure for land-use allocation — making sure that a chemical factory is not built next to a school, for example — and also for environmental protection in its many forms: air quality, water quality, species protection, safeguarded habitats, and, of course, the historic environment, including archaeology.

The historic environment consists of several types of ‘heritage asset’.³ These include individual buildings, archaeological sites, and wider landscapes or areas. Assets regarded as most significant are ‘designated’ under various regimes. The ‘Schedule of Ancient Monuments’ was first drawn up in the 1880s; its administration now varies across the UK due to the different relationships between the respective heritage bodies and their devolved governments.⁴ Scheduling protects nationally significant below-ground archaeology, but also includes ruins of castles and abbeys, and even bridges and other functional pieces of infrastructure. Designation was extended to buildings by the 1947 Act. This imposed a duty to maintain lists of buildings of historic interest, graded according to their significance (hence the term Listed Buildings); the grading systems are different in England and Wales, Scotland, and Northern Ireland. Designation of areas of ‘special architectural or historical interest’ was introduced by the Civic Amenities Act (1967); these Conservation Areas protect wider settings from intrusive development. The smallest, Heath Passage in Barnet, covers just over 1,000 m² and contains two buildings; the largest, Swaledale and Arkengarthdale Barns and Walls, covers 71 km² and contains over 1,000 buildings. Most Conservation Areas fall somewhere in between; there are now more than 10,000 across the UK, of which around 90% are in England (Historic England, 2019a).

The majority of heritage assets are not protected by designation — most historic buildings, sites, monuments, and areas are not Scheduled or Listed (although some may be locally listed). The impact of redevelopment on non-designated assets was addressed by the Ancient Monuments and Archaeological Areas Act (1979). This established ‘Areas of Archaeological Importance’ (AAIs): urban areas categorized by their archaeological sensitivity. Under the 1979 Act development in these areas could be delayed for up to ‘four months and two weeks’ to allow archaeological investigations to take place, although no provision was made for funding. The big step-change came in the 1990s: England and Wales adopted Planning Policy Guidance Note 16 (PPG16) from 1990, and Scotland’s Planning Advice Note 42 (PAN42) followed in 1994. PPG16 was superseded in Wales in 1996 by two Welsh Office Circulars relating to planning and the historic environment: 60/96 on archaeology, and 61/96 on historic buildings and conservation areas. Northern Ireland produced its own Planning Policy Statement 6 (PPS6) in 1999. All adapted two key principles from environmental legislation: the notion that archaeology was a ‘finite and non-renewable resource’, and the concept of ‘polluter pays’. Thus developers became responsible for funding archaeology, and archaeologists developed arrangements to deliver it.

The emphasis in PPG16, PAN42, 60/96, 61/96, and PPS6 on the ‘preservation by record’ of material remains was based on an understanding that archaeology created an objective valueless truth. However, this concept (and its counterpart notion of ‘preservation *in situ*’) began to be challenged after 1990, and emphasis moved from ‘mitigation’ towards developing understanding through research (Nixon, 2004; Thomas, 2019; Watson, 2020). At the same time the value of non-designated assets was increasingly recognized. Acknowledgement of the important role of heritage in place-making was accompanied by a recognition that cultural and natural heritage values were central to places’ significance (English Heritage, 2000; 2008). These philosophical shifts were encapsulated in Planning Policy Statement 5 (PPS5), which replaced PPG16 and PPG15 in England in 2010, and in Scotland’s Planning Advice Note 2/2011, which superseded PAN24 the following year. In Wales the Historic Environment (Wales) Act 2016 replaced the old Circulars 60/96 and 61/96 with Technical Advice Note 24 (TAN24), along with a ‘historic environment’ chapter in Planning Policy Wales. These changes introduced a more holistic approach to the historic environment, both above- and below-ground, making the delivery of public benefit a central outcome for planning-led projects (Southport, 2011: 7–9; Thomas, 2009). Thus emphasis shifted from record-making towards increasing understanding, and so enhancing significance.

In England these principles were carried through into the NPPF, which replaced PPS5 in 2012, and was itself revised in 2019. The NPPF is clear that all heritage assets represent an ‘irreplaceable resource’ which makes an important ‘contribution to the quality of life of existing and future generations’. Emphasis is placed on development ‘sustaining and enhancing the significance of heritage assets’, and on delivering public benefit from the enhancement of historic assets, places, and settings. Both designated and non-designated assets are material considerations in planning decision-making. Developers are required by LPAs ‘to record and advance understanding of the significance’ of heritage assets, and ‘to make this evidence (and any archive generated) publicly accessible’ (MHCLG, 2019: 54–57). These processes also help fulfil international obligations under the European Convention on the Protection of the Archaeological Heritage 1992 (Valletta Convention), ratified by the UK in 2000.

Development-driven archaeology and public benefit

Archaeology is a material consideration in the UK planning systems, which have been fairly effective in striking a balance between vibrant sustainable development and protecting archaeology and cultural heritage (Wills & Bryant, 2019a; 2019b). Public benefit in its broadest sense can be delivered, and sometimes very efficiently. However, legislation has created a complex and diverse ‘biosphere’ of archaeological structures, populated by several interconnected ‘ecosystems’ (Belford, 2020: 364–67); this complexity has created inefficiencies which do not always serve archaeology or the public as well as they could. The development of planning-led archaeological professions in the UK has been detailed elsewhere (Aitchison, 2012; Orange & Perring, 2017). A brief overview is necessary because of intersections with the development of planning frameworks outlined above, and to give context to the analysis which follows.

Just as Abercrombie, Beveridge, and others were contemplating rebuilding post-war society in the 1940s, so archaeologists were considering the impact of that rebuilding on the historic environment. These considerations led to the establishment of the Council for British Archaeology (CBA) in 1944, which coordinated the ‘rescue’ of threatened sites and advocated for archaeology; arguably, ‘the Blitz served as a stimulus to the development’ of archaeology (Milne, 2001: 2–3). The first local authority archaeology services were established in the 1960s, and not-for-profit archaeological organizations began to undertake fieldwork (Aitchison, 2012; Belford, 2012: 30–31). In the 1970s a regionally based national archaeology service was proposed for England and Wales. This system was adopted in Wales, where the four regional Trusts have proved resilient. However, it was rejected in England, where an ad hoc network of local trusts and university- and council-based ‘units’ developed. During the 1970s and 1980s public funding was reduced and changed in scope (Aitchison, 2012). In the 1980s ‘developer funding overtook public grants as the means of resourcing archaeological works’ in London (Morel, et al., 2017: 23), and so commercial archaeology was born.

Meanwhile, self-regulation developed. The CBA had set up a working party in 1973, which established the Institute for Field Archaeologists (IFA) in 1982. The IFA subsequently evolved: renamed the Institute for Archaeologists in 2006, it became the Chartered Institute for Archaeologists (CIfA) in 2014 (Hinton, 2011). CIfA encourages public benefit by independently accrediting archaeologists through peer review; members are required to ‘adhere to high standards of ethical and responsible behaviour’ (CIfA, 2019: 4). This gives public confidence in an archaeologists’ ability to practice. Since 1996 CIfA has also accredited archaeological organizations; there are currently eighty-one Registered Organizations (ROs) (CIfA, 2020a). As well as self-regulation by CIfA, a professional institute, various bodies represent their members’ interests. The Federation of Archaeological Managers and Employers (FAME) is a trade association for commercial archaeology; it began in 1975 as the Standing Conference of (Archaeological) Unit Managers, and was relaunched in 2008. Separate organizations of archaeologists employed by local authorities in Wales and England merged in 1996 to create the Association of Local Government Archaeological Officers (ALGAO), joined in 2006 by colleagues from Scotland. The CIfA, the CBA, ALGAO, and FAME continue to represent their different but overlapping and interdependent archaeological constituencies today — highlighting a characteristic sectoral tendency to fragmentation.

Development-driven archaeology in the UK can deliver public benefit by increasing knowledge, providing public engagement and enabling sustainable development. This is possible because of two equally important and interlinked components which work in partnership. One side are archaeologists who advise LPAs on the likely archaeological impact of development; they work together with developers and their archaeological consultants to find ways of balancing enhanced understanding of the historic environment with economic and social well-being. The UK planning system employs around 270 archaeologists who advise local authorities on development control in this way, and a further 100 or so who manage Historic Environment Records (HERs) (Rocks-Macqueen & Lewis, 2019: 13). These HERs contain data which informs archaeological development control decisions. LPAs ‘should maintain

or have access to a historic environment record' (MHCLG, 2019: 54), but although they are a statutory obligation in Wales, this is not the case in England or Scotland.

Good value is achieved when planning archaeologists require investigation of archaeological potential before the LPA determines whether to grant planning permission. This 'pre-determination' work 'is by far the most common means of securing [...] public benefit as a consequence of development' (Wills & Bryant, 2019a: 52). In other cases archaeological work is made a 'pre-commencement condition' of planning permission; careful monitoring of compliance with, and discharge of, conditions is essential — especially for post-excavation, reporting, archiving, and publication. The proportion of development works affected by archaeology is tiny: of 525,000 planning applications submitted in England, Wales, and Scotland in 2017–18, only 21,700 (4.1%) had archaeological implications, and only 2,600 of these (0.5% of the total) required pre-determination investigations (Rocks-Macqueen & Lewis, 2019: 8–9). The successful operation of the system relies on 'the availability of high quality specialist advice' to LPAs; local authority advisors are 'crucial'; a lack of specialist advice undermines 'the potential to achieve sustainable development' and has longer-term detrimental effects (Wills & Bryant, 2019a: 53).

The other side of the equation comprises commercial archaeology organizations which undertake archaeological work. Together these employ around 4,500 archaeologists (Rocks-Macqueen & Lewis, 2019: 13). There are a handful of very large organizations, and a much larger number of very small organizations. Only seven CifA ROs have more than 100 employees; these together employ 1,512 people, whereas the other 74 ROs together employ 1,379 people — not all of these are commercial contractors (CifA, 2020a: 32–39). Most archaeological organizations turn over less than £250,000 per year (Aitchison & Rocks-Macqueen, 2020: 16). Some of these organizations are for-profit entities which explicitly aim to provide their clients with 'strategic and tactical advice to minimise [...] archaeological risk' (Headland, 2020). Others are not-for-profit charities; some have maintained local or regional bases for their operations, others have acquired other similar organizations, expanded their own geographical scope, or both. Other organizations are semi-detached parts of local authorities or universities (much less so now than formerly); some are sole traders. Many contribute to wider developments in training, employment, and methodology.

There are other archaeological actors and 'ecosystems', of course, which are considered below; however, planning-led archaeology has arguably seen the most exciting developments. Vastly more archaeological work has been done in the last thirty years than ever before. The serendipitous nature of discovery has been enormously beneficial to archaeology: the planning process results in a random fieldwork sampling across the whole country. The resulting incremental development of knowledge and understanding is significant. Previously overlooked stories about the lives of working-class people, migrant communities, women, children, and teenagers — from deep prehistory to the twentieth century — are now being told through archaeology (Booth & Brück, 2020; Bradley, 2006; Caswell & Roberts, 2018; Fulford, 2011; Fulford & Holbrook, 2011; 2015). Knowledge gain is just one area of public benefit delivered by archaeology. Others include improvements in public health and well-being through engagement with archaeology and cultural

heritage; archaeology can also help improve the quality of places (Historic England, 2019b; 2019c; 2020). The current system works adequately for archaeology and archaeologists, and also delivers a degree of public benefit.

Planning for the future, understanding the past

The Planning Policy White Paper *Planning for the Future* was published in August 2020. It set out twenty-four different proposals under three ‘pillars’: planning for development, planning for beautiful and sustainable places, and planning for infrastructure and connected places (MHCLG, 2020a; 2020b). At the same time a related consultation set out proposals for measures to improve the effectiveness of the current system in the short term (MHCLG, 2020c). Much of the rhetoric and some of the substance of the White Paper are familiar: brownfield regeneration, quicker site allocation, faster build-out, and more affordable housing. Some travel in this direction has already taken place: ‘Permission in Principle’ was introduced in the Housing and Planning Act (2016), and extensions to ‘permitted development rights’ took place in 2017 and 2020. However, the White Paper marks a clear departure in scale and scope from what has gone before. It may also serve to reduce some consultation and accountability, and may not deliver environmental sustainability.

Rhetoric and reality

Some of the assumptions that underpin the White Paper are wrong or over-stated. The rhetoric has been provocative: it is striking that the word ‘development’ appears 254 times in the White Paper, but ‘constraint’ only eight; ‘value’ appears forty-two times, but ‘public benefit’ only once. In contrast the word ‘archaeology’ does not appear at all, and ‘heritage’ only ten times. The Prime Minister’s speech implied that regulations to protect the environment (potentially including archaeology) were preventing house-building, and that the complexity and opacity of the planning system generally was creating delays (Johnson, 2020).

It is true that small building firms consider the planning system to be the largest obstacle to project delivery and business viability; however, they acknowledge that this is because of how the system is resourced (NHBCF, 2017: 19–22). Between 2010 and 2018 central government funding for local authorities fell by 49.1% in real terms, equivalent to a 28.6% real-terms reduction in ‘spending power’ (HCLGC, 2019). Funding for planning, development, and housing services fell by more than 50%, and ‘highways and transport, and cultural and leisure services’ by more than 40% (Phillips, et al., 2019). In other words, planning and heritage saw some of the biggest reductions in local authority spending. Although the White Paper recognizes that ‘the new planning system should be funded by the beneficiaries of planning gain’, it is unclear whether this would be sufficient to overcome this long-term drain on LPAs’ resources.

Environmental regulations are not an impediment to development. It is true that the build-out rate for housing development is extremely low: on average it takes 15.5 years for a large site to be developed; in other words, in any given year only 6.5% of the available and permitted area for development is actually built on, and in London

this figure is 3.2% (Letwin, 2018b: 8). However this is not the fault of planners or environmental protection — these are build out rates for sites where detailed planning permission has already been granted. The main reason for the lack of new housing is the ‘absorption rate’: the rate at which developers believe they can sell houses ‘without materially disturbing the market price’ (Letwin, 2018a: 11). The situation is worse for large sites, particularly those with a low diversity of housing types; this is a result of limited competition.

Archaeology is only a consideration in 0.5% of planning applications, and it was not cited by developers as a reason for delay — and nor, in a properly managed system, should it be (NHBCF, 2017: 18–25; Rocks-Macqueen & Lewis, 2019: 22). It is not a significant cost burden. Over the past ten years the cost of archaeology to the construction sector has consistently been less than 0.15% of overall project costs (Rocks-Macqueen & Lewis, 2019: 15). Affordability would not seem to be a problem for the house-building sector. One leading house-builder maintained operating profit margins of 14.4% between June 2019 and June 2020 — a period of reduced activity due to Covid-19 (Pratley, 2020). In contrast, average profit margins for the UK as a whole have been around 10% for the last ten years (ONS, 2020).

Finally, the ‘build, build, build’ promise itself may not be deliverable. The White Paper proposes a ‘standard method’ to ensure that land supply is not a barrier to housing construction. Any ‘land constraints’ would be ‘factored in’ — presumably including known or designated heritage assets or areas, although no mention is made of undesignated assets. The ‘standard method’ determines compulsory housing allocations centrally using an algorithm (MHCLG, 2020c). This delivers significant increases in house-building in London and south-east England, smaller increases in the midlands and south-west, and fewer new houses elsewhere (Lichfields, 2020). It also seems likely that much of the additional housing allocation would take place in rural rather than urban areas, raising questions around the proposals’ environmental and political sustainability.

Categorization of land

The White Paper proposes a system of land-use planning with ‘automatic’ or accelerated planning permission in certain areas. Three categories are suggested (MHCLG, 2020b: 23–28):

- Growth areas ‘suitable for substantial development’ — likely to include urban regeneration and extension, including new towns and ‘growth-focused businesses’ around universities. Sites in this category would automatically have outline approval for development.
- Renewal areas ‘suitable for development’ — this could include ‘gentle densification’ of residential areas, as well as town-centre and rural development. Sites in this category would have a ‘presumption in favour of development’.
- Protected areas — which ‘would justify more stringent development controls to ensure sustainability’, including green-belt land, Areas of Outstanding Natural Beauty (AONBs), Conservation Areas, Local Wildlife Sites and other ‘important areas of green space’.

The principle of land categorization is not new in UK planning. Indeed, some long-standing categorizations are highly valued by most people, such as National Parks and Areas of Outstanding Natural Beauty (1949), Conservation Areas (1967), and World Heritage Sites (1986). Designations have also included areas set aside specifically for development: as well as the long tradition of ‘garden cities’ and New Towns discussed above, there have also been specific mechanisms intended to deliver regeneration such as Urban Development Corporations (UDCs) set up in the 1980s and 1990s. More recently the Town and Country Planning (Brownfield Land Register) Regulations (2017) require LPAs to keep a list of previously developed land suitable for residential development within fifteen years. ‘Permission in Principle’ already exists in these and other situations. However, it is clear that the proposed categorization massively over-simplifies the fine grain of the UK’s landscape and settlement patterns.

Evidently, ‘growth’ and ‘renewal’ areas will contain heritage assets, some of which may be designated or locally listed. There will need to be a mechanism by which these are assessed and recorded, and their setting protected or enhanced, before or as part of the development process (McOmish, 2018: 11). Previous politically driven initiatives for the redevelopment of brownfield land were not always sympathetic either to cultural heritage or local communities. Some of the work of the UDCs did take account of archaeology, but heritage was defined quite narrowly, and in some cases the UDCs ‘were effectively able to ignore the statutory planning process if they wanted to’ (Imrie & Thomas, 1999: 16). The White Paper suggests that ‘planning powers for Development Corporations can be reformed’, although possibly not in a way which would increase constraints upon them (MHCLG, 2020b: 30). More positively, consent routes in ‘growth areas’ will need to address ‘site-specific technical issues’ when moving from outline to full permission; this could include archaeology.

Equally, there will evidently be places within ‘protected’ areas with capacity for sustainable development. For example, National Parks in the UK are protected areas, but also living landscapes. When they were established it was ‘assumed that the town and country planning system could reconcile conflict between natural resource exploitation and recreation’ (Barker & Stockdale, 2008: 185). These principles still apply, and current policy encourages cautious redevelopment of brownfield land in these circumstances (MHCLG, 2019: 43). Similarly, the protection of World Heritage Sites is managed through individual designations — specifically Conservation Areas — and the spatial planning system: the NPPF is clear that development can take place in these areas, and responses to the impact on individual elements is determined both by their significance and their contribution to the significance of the wider area (MHCLG, 2019: 57). Therefore within the proposed ‘protected’ areas there must be some sort of mechanism to allow development to take place — including provision for understanding and protecting archaeology and cultural heritage. The current NPPF includes consideration of both designated heritage assets and non-designated ‘assets of archaeological interest’; these are not mentioned in the White Paper (MHCLG, 2019: 6, 63).

For archaeology the main problem with this categorization of land is that it removes the joyful serendipity of discovery. More than 50% of pre-determination planning work encountered ‘new’ archaeology where had been ‘no known heritage

assets' before evaluation (Wills & Bryant, 2019a: 52). If zones of archaeological significance had been drawn in 1990, this knowledge would have been lost to society. This also matters because the balance has shifted in the way in which significance is understood (English Heritage, 2008). As well as more weight being given to non-designated assets, archaeologists themselves have broadened the scope of their activities to include the more recent past (Belford, 2014; Harrison & Schofield, 2013). The purpose of development-led archaeology is not to deliver mitigation for the paying 'polluter', but to deliver public benefit through understanding archaeology and the historic environment. However, the inherent public benefit derived from archaeology is not articulated in the White Paper.

Aside from archaeology and heritage considerations, the proposed categorization of land is likely to create or increase social and economic disparities. The system of land categorization in the United States has been criticized for its negative impact on housing affordability and racial equality (Agyeman, 2020; Glaeser & Gyourko, 2002). Similar effects can be seen in the UK. For example, property values inside a Conservation Area are 10–20% greater than outside; this value goes up as the 'surrounding mass of built heritage increases' (in other words, the further away from the edge of the Conservation Area) but even properties near the boundary have a 5% premium on those outside (Ahlfeldt, et al., 2012: 5–6). The locations of Conservation Area boundaries also create problems — and although it is possible to ameliorate these by creating buffer zones, their success in the UK has been mixed (Larkham, 1997; Larkham & Morton, 2011). Buffer zones for World Heritage Sites in the UK are inconsistently applied (some have none), and mechanisms for their protection were not designed to address issues such as setting (Foster & Linge, 2002). It is hard to see how the more radical categorization proposed in the White Paper will avoid these issues.

Assessing, understanding, and embedding archaeology

The current system is clear on how public benefit is delivered through consideration of archaeology and the historic environment. The NPPF requires an application for planning permission to 'describe the significance of any heritage assets affected', and where necessary undertake archaeological assessment and evaluation before application (MHCLG, 2019: 55). This approach is good for risk management and due diligence; it creates certainty for developers by assessing constraints and risks, and so reducing costs. However, the White Paper does not provide any clarity about the nature of processes which could replace pre-application and pre-determination archaeological assessment. Historically, most land-use categorization in the UK has been designed to increase protection — through the creation of National Parks, Conservation Areas, and so on — rather than to reduce it. The White Paper suggests consideration of 'land constraints' in some areas, but no mention is made of non-designated assets, whether above or below ground, nor the mechanisms to identify and understand them (MHCLG, 2020b: 28). This creates significant concerns for archaeology.

One approach might be to map archaeological sensitivity. Precedents exist: for example, the AAIs established by the 1979 Act, and since the 1980s in London through Archaeological Priority Areas. This approach enables a more consistent and efficient use of resources (Kidd, 2019: 66). Through GIS analysis it would be

possible to establish the probable location of heritage assets, their vulnerability, and their association with other known or potential archaeological resources (McOmish, 2018: 11). As well as using HER data, this could also usefully incorporate existing mapping from existing sources such as Extensive Urban Surveys and Historic Landscape Characterisation (Aldred & Fairclough, 2003; Herring, 2009; Thomas, 2006). Mapping sensitivity in this way relies on accurate data and good modelling, a collaborative approach can ensure that 'creative mitigation efforts should be integrated at a landscape level' (Heilen, 2020: 5).

Mapping sensitivity and characterizing impact could potentially deliver much-needed syntheses of existing data, in turn providing 'an excellent starting point for taking a more strategic approach [...] to future archaeological work' (Thomas, 2019: 339). This could help situate site-specific development-driven interventions within archaeological research frameworks. Greater 'standardisation of technical supporting information' may be helpful (MHCLG, 2020b: 32). This may also present opportunities to improve the considerable variability in proficiency and accessibility of archaeological reporting (Wills & Bryant, 2019a: 22–27). Although lacking in detail, the tone of the White Paper suggests that a complex array of very different types of mitigation and constraint will be reduced to enable a simple 'yes or no' answer. There are limitations to predictive modelling — 'low risk is not the same as no risk' (Kidd, 2019: 66); the White Paper acknowledges a need for 'site specific information to mitigate wider impacts' (MHCLG, 2020b: 32). For this reason the approach would probably cost more than the existing system of case-by-case assessment, although it could potentially deliver greater public benefit. It is difficult to see how these costs could be made to bear directly on the developers responsible for individual impacts, although the proposed 'infrastructure levy' might support this. Consideration also needs to be given to integrating with other legislation which affects archaeology: including among others the Burial Act (1857), the Disused Burial Grounds (Amendment) Act (1981), the Protection of Military Remains Act (1986), and the Treasure Act (1996).

Finally, there are a number of proposals in the White Paper which concern place-making. Heritage — the built environment and below-ground archaeology — has long been recognized as a contributor to the value and significance of places (English Heritage, 2000; 2008; Historic England, 2020). It has been argued that people are emotionally connected to places, and in places with 'larger numbers of heritage assets, people have a stronger sense of place'; regeneration that is led by heritage and culture enhances people's experiences by 'shaping place identity' (Historic England, 2019b: 24–25). However, it is also the case that increasingly — particularly in dynamic urban centres — people also create and express identities in ways that are not related to place. Some specific elements of the White Paper are concerning: the suggestion that some practitioners may be able depart from normal listed building consent processes, for example, or the prioritization of a 'fast track to beauty' through design codes. These run the risk of being formulaic and not taking account of local character derived through heritage. Moreover, they raise the question of who defines 'beauty': a loaded issue which has the potential to create exclusion and division, leaving some voices unheard. This runs counter to the spirit of the Faro Convention, which identifies diverse public participation in cultural heritage as central to the sustainable development of society. All UK landscapes

are historic landscapes in one way or another, and archaeology and the historic environment needs to be central to the delivery of place-making.

Political, economic, and environmental sustainability

The NPPF sets out three interdependent overarching objectives ‘which [...] need to be pursued in mutually supportive ways’ to enable the planning system to achieve sustainable development: economic, social, and environmental (MHCLG, 2019: 5). It is worth considering how the White Paper addresses these. Political sustainability is delivered through local engagement with the process. The current planning system works because it gives control of the system to the people, both directly and through their local elected representatives. Some White Paper proposals represent positive steps forward: the idea of a digital map-based system of Local Plans implies that HERs (which are already GIS-based datasets) would be closely integrated. However, this is not explicit — and the complexity of integrating a wide range of geospatial information should not be under-estimated (MHCLG, 2020b: 38). Making HERs in England a statutory requirement (as they already are in Wales) would help secure this essential information resource.

The desire to ‘increase public participation from a broader audience’ is positive. Archaeology and historic environment considerations need to be articulated with clarity and detail in Local Plans. The timetable for Local Plan delivery is ambitious, and penalization of LPAs who fail to meet it could be counter-productive — without a Local Plan development would either stop altogether or proceed with no consent regime. Unfortunately, the emphasis on accessibility and engagement in Local Plans is undermined by the change from a system based on policies — which can be tailored to local situations — to one based on centrally determined rules. Locally negotiated Section 106 and Community Infrastructure Levy arrangements will be replaced by central government decision-making about wider public benefits. More significantly, the potential for local democratic accountability at subsequent stages will be limited. This inhibits local residents developing a personal stake in their heritage: people ‘participating in the process of protecting archaeological sites [...] become stewards of, and advocates for, the use of that information’ (Baugher, et al., 2017: 2).

Reform of the existing Community Infrastructure Levy has been noted elsewhere. The proposal is for ‘mandatory nationally-set rate or rates’ charged as a proportion of development value. The positive ambitions for the ‘infrastructure levy’ include more freedom being given to LPAs over how they spend the income generated; the stated intention for the reform is to ‘increase revenue levels nationally’ (MHCLG, 2020b: 49). However, the reformed infrastructure levy is being expected to do a great deal: delivering affordable housing and environmental benefits as well as infrastructure. Although it could potentially increase resources for the work of LPAs, a flat rate would disadvantage those LPAs where development values are lower — and whose local (non-designated) heritage may be perceived to be of lower significance.

It is not clear how some elements of the White Paper align with the principles of ‘sustainable development’. These are set out in the NPPF, and in the Government’s 25-year environment plan, whose first policy is about embedding an ‘environmental

net gain principle for development, including housing and infrastructure' (DEFRA, 2018: 12; MHCLG, 2019). The important links between the historic environment and the natural environment are implicit in over-arching policy statements: 'the way our rural and urban environment looks now owes as much to the work of people as nature [...] we have shaped and adapted our rural and urban landscape'; and they are made explicit by a series of references to cultural heritage (including archaeological heritage) throughout the document (DEFRA, 2018: 17). This has since been followed through in the way that specific policies have been aligned with an ecosystems services approach to measuring public goods. The notion of public goods is the cornerstone of the new Environmental Land Management scheme to be phased in from 2021; these are defined as things which have no economic market and are available to all — air, water, biodiversity, of course, but also 'cultural heritage', including archaeology. Public goods, or public benefit, are not prominent in the White Paper.

This lack of synergy is apparent at a detailed level as well. As noted above, one of the key ambitions of planning reform is to increase housing provision. Densification of existing urban areas is more efficient because it is easier to augment existing infrastructure than to build from scratch (Bessis, 2018). Although 83% of the population occupies around 8% of land area, the UK has some of the least densely populated cities in Europe (DEFRA, 2019; EFTEC, 2017). Despite this, the pressure on Green Belts has increased significantly in recent years, notwithstanding the provisions of the NPPF: 79% of residential planning applications in Green Belts during 2009–10 were for brownfield sites, but by 2018–19 this figure had dropped to only 28% (Glenigan, 2019: 7). However, the algorithm for housing allocation published alongside the White Paper would deliver most new development outside urban areas — for instance, allocations in Leicester would be reduced by 35% against current plans, but would increase by 105% in rural Leicestershire (Lichfields, 2020; O'Brien, 2020).

Finally, the new system will need to meet 'international obligations for environmental protection' (MHCLG, 2020b: 44). Much of the current system of Strategic Environmental Assessments, Sustainability Appraisals, and Environmental Impact Assessments derive from EU regulations and directives. This is a complex area which requires considerable thought and consultation; for continuity it would be sensible to retain a degree of compatibility. The White Paper mentions 'a separate and more detailed consultation' for these matters later in 2020 (MHCLG, 2020: 44). Fortunately, both the Valletta Convention, which creates a commitment to adequately resource and protect archaeology and archaeological investigation, and the Faro Convention, which promotes cultural heritage protection as a core public right and benefit, are treaties of the Council of Europe. Therefore these obligations are not affected by the UK's departure from the EU, as long as the UK continues to respect international law.

Some of the themes in the White Paper are not unique to the UK. Archaeologists elsewhere in Europe are also concerned about the relaxation of constraints on planning and development. Some of these are framed as a means of reactivating the economy in the wake of the Covid-19 crisis, but in reality they may be pursuing deeper agendas. For example, in Spain, Andalusia and Madrid have both announced legal reforms in the name of 'simplification' and 'flexibility' which will relax the

requirements for archaeology and cultural heritage in association with construction projects (Almansa-Sánchez, 2020). In 2015 the German state of Lower Saxony (Niedersachsen) decided that the ‘polluter pays’ principle would temporarily not apply for the construction of facilities for refugees (Diane Scherzler, pers. comm.). Colleagues in Spain and Germany are concerned that relaxations in one region could be adopted by another. It is possible that elements of the White Paper proposals for England could find their way into policy and practice in Wales, Northern Ireland, and Scotland. As noted elsewhere, the very complex ‘biosphere’ of UK archaeological ‘ecosystems’ may compromise the sector’s ability to defend against the threats posed by the White Paper and associated reforms.

Archaeology and archaeologists: challenge or crisis?

The White Paper coincides with wider challenges to the status quo. The climate emergency has provoked widespread reconsideration of human relationships with the natural environment. Covid-19 created a hiatus in economic activity which produced short-term environmental benefits; for many this reinforced concerns about the viability of the western model of economic growth and ‘sustainable’ development (Helm, 2020). Black Lives Matter highlighted long-standing systemic inequalities throughout Western society, provoking reconsideration of the structures that regulate behaviours. Many organizations used this as an opportunity to ‘reset’ approaches, not always positively or successfully (Grosvenor, 2020). The human crises of 2020 challenged archaeologists to ‘critically take stock of the power structure that frames archaeological practice’ (Douglass, 2020). Along with Covid-19 and Black Lives Matter, the planning White Paper prompts reconsideration of the values and structures of UK development-driven archaeology.

There is also a significant and immediate economic threat. There have been four serious recessions in the UK since ‘polluter pays’ principles were adopted in environmental management: in the mid-1970s, the early 1980s, the early 1990s, and the crisis of 2008–09 (Aliber & Kindleberger, 2015). The response to the Covid-19 pandemic created a new recession, which may be exacerbated in 2021 by the UK’s departure from the EU. Historically, archaeology has suffered during recessions, and although development-driven archaeology may appear most vulnerable, in fact all forms of archaeology are likely to see reduced levels of funding from private- and public-sector funders (Schlanger, 2010). Even where there are attempts to offset the impact of recession through increased public spending, historically this has been ‘insignificant when compared with the sums that were being invested [...] pre-crisis’ (Aitchison, 2014: 70). This presents an opportunity to consider how to make archaeology more resilient and sustainable for the future.

The vulnerability of archaeological structures

The Valletta Convention requires archaeology to be part of the planning system, but the form that takes depends on each country’s cultural and political context. Approaches to the ‘polluter pays’ model elsewhere in Europe may be less adversarial, and less reliant on private-sector ‘entrepreneurship’ which can be perceived to be the consequence of a forced market (Benetti & Brogiolo, 2018; Demoule, 2010).

This reflects the differences between the UK's common law tradition, in which society is self-regulating ('social licence'), and the Roman law tradition where regulation is by the state. Most UK archaeologists recognize that 'political decision making by states' does not necessarily produce better results than 'economic decision making by companies' (Willems, 2014: 114). For archaeologists, just as commercial pressures in the private sector may give rise to conflicts of interest, so monopolistic state administration of heritage creates political pressures (Belford & Wait, 2018: 56–58). However, to succeed, the UK 'social licence' model needs to be an equal partnership between public regulation and private delivery, with standards guaranteed by independent accreditation of archaeologists and organizations.

The current planning system is financially efficient: it has been estimated that a purely reactive approach could cost up to twenty times more (Rocks-Macqueen & Lewis, 2019: 40). However, resourcing complex archaeological planning needs is already challenging for some English LPAs, and their workload will only increase if a system of front-loaded assessment and evaluation is introduced as a result of the White Paper. There may be some scope for additional support through the proposed 'infrastructure levy'; making HERs statutory would also help. LPAs could also consider pooling their resources in shared not-for-profit expertise. The 1970s regional model was not adopted in England, but four Trusts were established in Wales and have proved resilient, delivering a range of archaeological services, including maintaining (statutory) HERs and providing archaeological advice to LPAs (Belford, 2018: 8–9). They enjoy political, financial, and operational advantages from being outside government; their regional expertise acts as an efficient bridge between national policy and local practice — and enables commercial archaeology to deliver high levels of public benefit.

The procurement and delivery of commercial archaeology is imbalanced. Half a dozen large organizations dominate; these also form consortia to deliver substantial infrastructure projects such as Crossrail, HS2, and the A14. These well-publicized projects are impressive in the scale and quality of their archaeology, but they are literally exceptional, being publicly funded and not wholly delivered through the planning system. Consequently they enjoy extra provisions for archaeology, such as ministerial intervention to allow additional resources for excavation of 'unexpected remains' (Carver, 2013: 2). In contrast, most planning-related archaeological work is on a much smaller scale, usually undertaken as pre-determination works or as pre-commencement conditions (Wills & Bryant, 2019a: 51–53). This is a competitive 'price-led' market with narrow margins (Southport, 2011: 69). Some developers even take legal action to remove archaeological planning requirements (Phillips, 2019). Consequently, most commercial archaeology tends to 'default to using the language of risk management', remaining more concerned with 'least-cost compliance with regulation' than delivering 'maximum net value to society' (Nixon, 2017: 13). As a result many smaller archaeological organizations struggle to support functions such as staff development, which consequently affect long-term resilience.

Critics of the 'social licence' model argue that archaeology becomes commodified, but in a flawed market where 'the client has no interest in buying the product' (Depaepe, 2016: 39). There are few opportunities for smaller archaeological organizations to offer high-value products or services; 'it is hard to find examples of

procurement on quality over price, other than on major schemes' (Nixon, 2017: 13). The 'embedded conservatism' of developer-driven archaeology inhibits change (Watson, 2019: 1649–50); some archaeologists may not have accepted or embraced moving beyond 'preservation by record' (Thomas, 2019: 339). Even enthusiastic advocates of commercial archaeology acknowledge that 'the investigation of below ground remains, with its strong element of risk and unknowns, is not ideally conducive to a purely commercial form of procurement' (Carver, 2011: 529). Variable approaches in practice are linked to 'differences in the scope and value of development' in different places, as well as approaches to enforcement and public engagement (Wills & Bryant, 2019: 54). This can result in inefficient use of resources: one study found that 'fully half of [archaeological] interventions produced outcomes of negligible significance' (Kidd, 2019: 66). A pressured market with uncertain regulatory levers may not always be able to deliver public benefit.

Two areas of archaeological practice highlight this issue. One is the specification of an appropriate level of meaningful assessment within the constraints of planning reasonableness. A watching brief is a common compromise for 'low risk' areas. This is a 'formal programme of observation and investigation conducted during any operation carried out for non-archaeological reasons', but constrained by the need to avoid 'unreasonable disruption to [...] work schedules of other contractors' (CIfA, 2014a: 4–10). In practice, therefore, a watching brief often comprises relatively inexperienced archaeologists observing time-pressed subcontractors excavate narrow trenches for services or footings, often in poor conditions with limited visibility. Watching briefs can be a waste of high-value skills and expertise. They may improve the income of commercial archaeology organizations, but they provide poor archaeological returns and limited public benefit.

Another example of poor public return from archaeological investment relates to long-standing issues around post-excavation and reporting; and the delivery of, and access to, publications and archives (Boyle, 2019; Brown, et al., 2014). The notion of 'preservation by record' relies on appropriate archiving of archaeological projects — and archaeological archives can only deliver public benefit if they are well managed and accessible for future researchers (Watson, 2020: 3). CIfA requires that procurement of archaeological services from or by its members and ROs must include adequate post-excavation provision (CIfA, 2014b). However, in most cases the planning conditions relating to archaeology are discharged before the archiving stage of a project has been completed, and this can be problematic when developers refuse to pay or cease trading altogether (Palmer, 2020: 28–29). There is also no requirement for museums to accept archaeological archives.

Archaeologists: fragmented, but not diverse

If archaeology is a 'biosphere' made up of a series of 'ecosystems', then clearly some ecosystems engage more readily with others (Belford, 2020: 365–67). Some UK readers may recall a 1960s comedy sketch which characterized the British class system through the stature of three comedians: 'I look up to him because he is upper class, but I look down on him because he is lower class'. In some ways UK archaeology is a version of that sketch, played out on a 'Penrose staircase' of the

sort depicted by the graphic artist M. C. Escher. These tenacious mutual suspicions are corrosive and counter-productive at the best of times — but especially so when current challenges potentially threaten the whole archaeological ‘biosphere’. Around a quarter of archaeological organizations have identified persistent sector skills shortages (Aitchison & Rocks-Macqueen, 2019: 26), and these will only be addressed by full cross-sector co-operation — involving colleagues in state heritage agencies, academia, and elsewhere, as well as LPA and commercial archaeologists. The additional pressures created by the White Paper proposals urgently require ‘a more collegiate and connected way in which the wider sector [...] work[s] towards outcomes that benefit the historic environment, people and places’ (McOmish, 2018: 10).

The lack of cohesion between commercial archaeologists and other practitioners has historically been framed as a dichotomy between ‘problem-oriented and curiosity-driven research’ and ‘development-led [...] or planning-related research’ (Darvill, et al., 2019: 2). In fact, as noted above, the academic potential of development-driven archaeological data has long been recognized. Recent studies have made good use of HER data and the expertise of archaeologists in commercial organizations (Booth & Brück, 2020; Caswell & Roberts, 2018). Collaborative research projects involving archaeologists from all sectors are increasing: several commercial and academic partnerships have supported doctoral and post-doctoral work, which has also engaged communities (Nixon, 2017: 8–9). Nevertheless, the flow tends to be away from field archaeologists towards academics; the structure of much development-driven archaeology can marginalize or isolate voices from the commercial side (Watson, 2019). Community archaeology has also developed a specialist area of professional expertise in its own right, requiring an extensive and varied suite of personal skills (Brown, et al., 2018: 7–9). Community archaeology potentially provides a bridge between professional, planning-led, development-driven enquiry on the one hand, and academic, theoretically led curiosity-driven research on the other.

The system can only succeed — for developers, archaeologists, and society at large — if it has strong professional self-regulation. Archaeologists regularly express concerns about standards, about the status of the discipline, and about career pathways. Yet only 3,033 of the 7,195 archaeologists working in the UK are accredited members of ClfA, the only professional institute for archaeology (Aitchison & Rocks-Macqueen, 2019: 15; ClfA, 2020c: 4). Archaeologists working outside commercial archaeology — for example, in museums or universities — may feel that membership of other bodies may be of greater benefit. Some archaeologists remain wary of hangovers from ClfA’s origins as a body for ‘field archaeologists’, equally many practitioners see it as a club for managers and employers (although that is literally the role of FAME). ClfA now has active specialist groups supporting members working with archives, historic buildings, finds, information management, marine archaeology, and voluntary and community archaeology. Independent professional accreditation through peer review provides public confidence in an archaeologist’s ability to practice. ClfA is an accountable and democratic body which creates and reinforces standards, and develops guidance to help archaeologists meet those standards. The point of professional self-regulation should be that professionals regulate themselves, although

only 5% of CIfA members actively volunteer to support their professional institute (CIfA, 2020c: 4–6). CIfA needs archaeologists to actively engage and support it.

Professional accreditation through CIfA can also help address working conditions, career development, and equality and diversity (Belford & Wait, 2018: 63). The profession is middle-aged and middle-class. It is not as male as it once was: the proportion of women in UK professional archaeology rose from 35% in 1998 to 46% in 2013, although women still tend to disproportionately occupy more junior and less secure positions. Over 99% of paid archaeology staff are white, yet white people only comprise 86% of the UK population (Aitchison, 1999; Aitchison & Rocks-Macqueen, 2013). Barriers to entry and progression are part of a much wider set of colonially derived imbalances and boundaries within UK education and employment infrastructure, but archaeology could do more to adopt successful approaches from elsewhere to improve diversity and business sustainability (Dave, 2016; Doerer, et al., 2012: 81–84; White & Draycott, 2020). This includes accessibility of training and networking opportunities as well as more transparent recruitment and career structures.

There is significant public enthusiasm for heritage in general, including archaeology. Around 7 million people — more than 10% of the population — are members of the National Trust, English Heritage, Cadw and Historic Environment Scotland; 94% of people think it is important that ‘heritage buildings or places are well looked after’ (Historic England, 2019b: 18). However, this interest is not evenly distributed across the population. Although 74% of the English population visit a heritage site once a year, only 59.8% of those in the most deprived areas had done so, compared with 85.7% for those in the least deprived areas; there is much less engagement with heritage by non-white groups, especially ethnicities described as ‘Asian’ or ‘Black’ (Historic England, 2019b: 10–11). This reflects, or is reflected in, the lack of diversity within archaeology noted above. Archaeologists often fail to translate broad public support into specific actions which safeguard archaeological structures, methods, and people. Archaeology should be about selecting ‘an inheritance from an imagined past’ and deciding ‘what should be passed on [...] to an imagined future’ (Tunbridge & Ashworth, 1996: 6). Some archaeological approaches may not necessarily be good for archaeology or archaeologists. If there are restrictions — on funding, capacity, and skills — then the profession needs to ensure that ‘resources are carefully focussed onto work which will yield advances in understanding, and not used on unproductive or unnecessary tasks’ (Hook, et al., 2016: 34). After all ‘the destruction of an archaeological site is not always a drama’, but good management of the resource may be impeded by current regulations which prevent us from reaching ‘sensible decisions’ (Almansa-Sánchez, 2017: 60).

Conclusion

The White Paper creates potential threats to the current arrangements for archaeology in the planning system. They include an oversimplified categorization of land, reduced potential for public engagement, and more formulaic approaches to

conserving the historic environment and its setting. Whilst the current system is far from ideal — for archaeology and archaeologists — it does deliver some public benefit. Enhanced protection and understanding of the historic environment is a benefit to wider society; archaeology positively contributes to sustainable development for the benefit of future generations. Yet the UK archaeology and historic environment sector is small and vulnerable, and internal fragmentation makes external advocacy difficult. Coordination with other cogent disciplines, such as environmental and earth sciences, remains weak. Change presents opportunities as well as threats. Archaeologists need to work together to develop the professionalism of the sector. Perhaps instead of chasing every project at any price, it is time to try doing less, but better. Archaeologists need to think carefully, and choose their battles wisely. There is not a moment to lose.

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Notes

- ¹ Most local government in England (125 councils) operates under a one-tier system (unitary authorities, metropolitan districts and London boroughs); in some places a two-tier system has survived, with 27 county councils containing 201 district councils. All 22 councils in Wales, and all 32 councils in Scotland, are unitary authorities. In Northern Ireland there are 11 district councils.
- ² Also known as Local Development Plans (LDPs), the NPPF (2019) calls them 'development plans'; other planning guidance, including the 2020 Planning White Paper, calls them 'Local Plans'. For simplicity this term will be used here throughout.
- ³ A 'heritage asset' is defined in the NPPF as: 'building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest' (MCHLG, 2019: 67).
- ⁴ Statutory responsibility for scheduling in Scotland rests with Historic Environment Scotland, and is not a ministerial responsibility; in England, Wales, and Northern Ireland the relevant minister does have responsibility, advised by the heritage body which in England is an executive non-departmental public body (Historic England), and in Wales and Northern Ireland part of the civil service (Cadw and the Department of the Environment Northern Ireland — Historic Environment Division respectively).

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