22 April, 2014

Dear Sir / Madam,

Historic Environment Scotland Bill

Thank you for the opportunity to provide evidence to this inquiry. Written evidence submitted on behalf of the Institute for Archaeologists is attached.

The Institute for Archaeologists (IfA) is a professional body for the study and care of the historic environment. It promotes best practice in archaeology and provides a self-regulatory quality assurance framework for the sector and those it serves.

IfA has over 3,000 members and more than 70 registered practices across the United Kingdom. Its members work in all branches of the discipline: heritage management, planning advice, excavation, finds and environmental study, buildings recording, underwater and aerial archaeology, museums, conservation, survey, research and development, teaching and liaison with the community, industry and the commercial and financial sectors.

IfA’s Scottish Group has over 200 members practising in the public, private and voluntary sector in Scotland. Furthermore, IfA is a member of the Built Environment Forum Scotland (BEFS), a network organisation that brings together non-governmental organisations and professional bodies that work with Scotland’s built environment. IfA has contributed to and endorses the evidence submitted on this matter by BEFS.

IfA has successfully petitioned for a Royal Charter of Incorporation, and following a Privy Council meeting on 11 February 2014 Her Majesty the Queen signed an Order of Grant.

Yours faithfully,

Tim Howard LLB, Dip Prof Arch
Policy Advisor
Historic Environment Scotland Bill

Evidence of the Institute for Archaeologists (IfA)

IfA has contributed to and endorses the evidence submitted on behalf of BEFS which is not repeated here. The following evidence supplements that submission, specifically from an IfA perspective.

5. Are there any areas of the Bill that you consider could be strengthened or improved?

(1) The role of local authorities and their historic environment and archaeology services is central to the management and promotion of Scotland’s historic environment. Although the provisions in this enabling Bill may be wide enough adequately to allow Historic Environment Scotland to provide all necessary support to local authorities, it would be helpful more specifically to identify its functions in relation to local authorities (for instance, by supplementing the provisions in clause 11(1) and (2) with similar sub-clauses expressly relating to local authorities, as suggested by BEFS).

(2) Furthermore, the management and promotion of Scotland’s historic environment would be significantly improved by the inclusion in the Bill of provision to secure the future of Historic Environment Records (HERs) / Sites and Monuments Records (SMRs). Although Scottish Planning Policy currently provides that ‘Planning authorities should ensure they have access to a Sites and Monuments Record and/or a Historic Environment Record that contains necessary information about known historic environment features and finds in their area’ (paragraph 124: http://www.scotland.gov.uk/Publications/2010/02/03132605/8), such records remain vulnerable to budgetary pressure. A statutory duty on local planning authorities to have access to an up-to-date HER or SMR supported and maintained by professional archaeologists would not impose a significant additional burden, given that the resource already substantially exists. Securing HER / SMR coverage conveys considerable benefits (through engaging communities and facilitating sustainable development) and avoids potential costs (if such development is delayed or frustrated or if historic assets are damaged or lost by an inability timeously to consider the impact of development upon the historic environment). Such benefits more than justify the imposition of such a duty.

7. The Scottish Government’s newly published historic environment strategy also seeks to improve enjoyment and understanding of Scotland’s historic environment. The Committee does not wish to repeat the extensive consultation undertaken on the strategy, but would welcome your views on whether it and the Bill together:

- o establish clearly who is responsible and accountable for delivering the strategy;
- o will involve appropriately all those public and private bodies with a role in improving the historic environment;
- o lead to demonstrably better access to, and enjoyment and management of, the historic environment.

(1) IfA fully supports the Historic Environment Strategy. One of its strengths is its collaborative nature, providing a shared vision for Scotland’s historic environment. With such inclusivity, however, comes the risk that ‘everyone is responsible and no-one is accountable’. IfA supports BEFS in its desire to work with Ministers and Scottish Government better to articulate issues of accountability in the Strategy.

22 April 2014