

## Response ID ANON-2R96-BD6Z-9

Submitted to **Working On and Near to Scheduled Monuments**

Submitted on **2021-05-04 10:09:14**

### Introduction

#### 1 Are you responding as an individual or an organisation?

On behalf of an organisation, public body or charity

If you've chosen 'Other', please specify here::

#### 2 Your data

I agree to the privacy notice :

Yes

### Organisation or community

#### 3 What is your organisation or community group?

If responding on behalf of an organisation or a community, please enter the name here.:

Chartered Institute for Archaeologists

#### 4 What is your name?

What is your name?:

Rob Lennox

### Permission to publish

#### 5 Please indicate your publishing preference:

Publish response with name

### Aims and objectives

#### 6 To what extent is this document helpful to:

**Matrix / document helpful - Understand what options are available to you if you are planning work on a scheduled monument?:**

Very helpful

**Matrix / document helpful - Understand more about scheduled monuments and the role of HES?:**

Very helpful

**Matrix / document helpful - Understand more about the legal protection of scheduled monuments and the consent processes?:**

Very helpful

### Case studies

#### 7 We will publish separately short case studies about working on or near scheduled monuments. What kind of case studies would you like to see to illustrate this guidance?

Please type below the kind of case studies and topics you would like to see featured.:

#### 8 Do you have any examples that you would like us to publicise?

Please type your example/s in the text field below. Please include the name of the scheduled monument or the place, a brief description of activities and the main outcomes.:

#### 9 If you suggested a case study, please give us your email address so we can follow up with you.

Please type your email address here.:

### Language

**10 We tried to use language that is as clear and accessible as possible throughout this guidance. To what extent do you think the guidance achieves this?**

Well

**What could we improve? Please add your suggestions here.:**

Broadly, we think that the guidance is clear and accessible. However, we have a few points that we feel it will be necessary to address.

The document uses the term 'archaeology' incorrectly several times in the document, three time on page 5, paragraph 4, and once on page 14, paragraph 4. Archaeology is the study of the physical remains of the past, not the heritage assets/material/artefacts themselves. We recommend revising these paragraphs accordingly. For example:

Page 5: "Heritage assets with archaeological interest, including buried artefacts, that are associated with a scheduled monument often extend around it and beyond the legally protected area. We call these 'undesigned heritage assets'. If you are planning work that might affect undesigned heritage assets you should get advice from your local authority archaeologist. Contact details are listed at the end of this note."

Page 14: "This includes magnetometry, gradiometry and ground penetrating radar surveys for archaeological heritage assets or buried services. It also includes metal detecting. Resistivity survey does not need metal and mineral detecting consent."

We are also concerned that in places, the document underplays the fact that specialist are needed for working on or near scheduled monuments. For example, interpreting GIS data.

While the document notes that "If you have any difficulty... we can help" but does not explain that digital skills like using 'QGIS', and fieldwork skills like 'Identifying the boundary of a monument on the ground' are tasks that require knowledge and - likely - training.

The document should therefore be extremely careful about giving the impression that these are things that anyone can just have a go at. Doing so could lead to tangible harm to historic assets.

It would be appropriate to insert reference(s) to consult a professional archaeologist when undertaking certain activities and highlighting the risks if unskilled individuals attempt work without appropriate guidance.

## **Planning work near a scheduled monument**

**11 After reading these sections, to what extent do you feel confident that you could:**

**Matrix/ Section 1 - Find out if there is a scheduled monument near where you are planning work?:**

Very confident

**Matrix/ Section 1 - Consider what options might be suitable to protect it?:**

Very confident

**Matrix/ Section 1 - Get further advice if you need it?:**

Somewhat unconfident

**Is there anything that we missed out? Please type your suggestions here.:**

As suggested above, we recommend adding reference to consulting a professional archaeologist and warnings about the skills required to undertake work on or near a SM.

## **Scheduled monument consent**

**12 After reading the text, to what extent do you feel confident that you understand:**

**Matrix/ Section 2 - When consent is required?:**

Very confident

**Matrix/ Section 2 - How to make an application?:**

Very confident

**Matrix/ Section 2 - What the process involves?:**

Very confident

**13 To what extent do you feel there is enough information about:**

**Matrix / other consents - Metal and mineral detecting consent?:**

Just right

**Matrix / other consents - Relationship to other consents?:**

Just right

**14 Is there anything missing from this section?**

Please type your suggestions here.:

### **Works without consent**

**15 To what extent do you feel you understand:**

**Matrix / Section 3 - What actions HES can take in response to works without consent?:**

Very confident

**Matrix / Section 3 - How scheduled monuments are legally protected?:**

Very confident

**Is there anything that we missed out? Please type your suggestions here.:**

### **Anything else?**

**16 Does the document leave out anything that should be included?**

Yes

**17 If you said 'Yes', please explain your answer in the box below.**

Please type your answer here.:

As stated, it may be useful to include a paragraph which indicates that 'working on and near Scheduled Monuments will often require specialist skills, and you may need to consult a professional archaeologist'.

**18 Do you have any links or sources of information that you think we should include in our 'Further Information' section?**

Please type your suggestions here.:

**19 As we continue to develop our suite of guidance are there topic areas you would like to see covered?**

Please type your suggestions here.: