

12th July 2012

Standard and Guidance consultation
Institute for Archaeologists
SHES, University of Reading
Whiteknights
PO Box 227
Reading, RG6 6AB

Tel/Fax: 01433 639879
Mobile: 07711 492378

phuxtable@british-aggregates.com
www.british-aggregates.co.uk

Consultation on the IfA Standard and guidance for archaeological advice by historic environment services

We welcome the opportunity to respond to this consultation.

The British Aggregates Association (BAA) represents the interests of nearly 100 members of which two-thirds are independent and privately-owned SME quarry companies throughout the UK with some 12% of national output and who operate out of over 180 sites. We are part of the consultation and lobbying process both in the UK and Europe – and are also represented through the CBI (Confederation of British Industry) Minerals Group and CPA (Construction Products Association); and actively and constructively engaged with the UK Minerals Forum which consists of all stakeholders with interests with the minerals industry. This includes central, devolved and local government officials; planners, heritage groups and NGOs as well as industry representatives. We are also an active member of the Minerals and Historic Environment Forum (MHEF).

We would comment as follows:

Section 2 The Standard. We responded to the earlier consultation in February 2012 and most specifically that *archaeological curators should adhere to the document 'Mineral Extraction and Archaeology: A Practice Guide' (MHEF 2008) when dealing with any mineral application.* This needs clearly and unambiguously stating here.

Section 5.6 Encouraging community engagement in planning decisions. This should be left strictly to the planning officers in charge of the application. Otherwise Local Authority archaeologists could be required to pro-actively support anti-development groups which would be professionally inappropriate.

Section 13.1. Monitoring and Managing the quality of Archaeological Work. We are concerned over potential restriction of trade issues. Para 13.1.5 should be removed in entirety and the comment in 13.1.6 that "in England Scotland , planning policyin accordance with IfA standards.." should also be removed as it is not stated in NPPF.

Whilst It is good to recommend that practitioners should adhere to IfA standards, whether members or not, it cannot be a requirement that they are members. This would reduce the number of organisations that could carry out work to about 60. There are less than 75 IFA registered organisations in the UK (of which 15 or so are local authorities or similar). We would estimate there are over 300 commercial organisations working in the UK.

For years our members and associates (as developers and their advisers) have fought against the closed shops that used to operate in some regions, that meant only one or two units could operate there and kept the costs disproportionately high. Those days have gone - but this would bring it back and the cost of fieldwork to the developer will go up, especially in rural areas and to SME operators.

We trust you find our comments helpful.

Yours Sincerely

A handwritten signature in blue ink, appearing to be 'P. Huxtable', written in a cursive style.

Peter Huxtable

MA(Cantab), CEng, FIMMM, FIQ