



Date: 17<sup>th</sup> May 2020

Dear Rob,

### **Curating the Palaeolithic Guidance 2020 Consultation**

Thank you for the opportunity to comment on the consultation draft of the above. I am responding on behalf of the Association of Local Government Archaeological Officers: England. The Association (ALGAO) is the national body representing local government archaeology services at County, District, Metropolitan, Unitary and National Park authority level. These provide advice to nearly all the District, Unitary and other local government bodies in the country.

ALGAO: England co-ordinates the views of its member authorities (92 in total) and presents them to government and to other national organisations. It also acts as an advisor to the Local Government Association (LGA) on archaeological matters. The range of interests of our members embraces all aspects of the historic environment, including archaeology, buildings and the historic landscape, and our stated aims are to:

- Provide a strong voice for local authority historic environment services and promote these to strengthen and develop their role within local government in delivering local and national government policy
- Ensure local government historic environment services are included within policy (national and local) for culture and education
- Ensure that policy aims to improve the sustainable management of the historic environment
- Promote the development of high standards in the historic environment profession

The comments below include the views of several curatorial archaeologists, but some ALGAO members may have different views to those expressed below.

We welcome the intention to provide updated guidance on this fascinating but technically complex subject and acknowledge the extensive work which has gone into preparing the draft guidance. However, we consider that further revision and addition is required to provide guidance which will be useful in a planning context. The document includes much very helpful information but should be improved in the following ways:

- Length – at 60+ pages the core document is too long for easy use.
- It should be made more concise, which may help with length.
- It should be reordered to avoid the potential for confusion and loss of interest - see comments below.
- There should be more consideration of how the techniques and measures of significance should be related to the decision-making process set out in the NPPF.
- It should be more balanced in terms of detail provided e.g. section 5, part 6 are very detailed compared with sections 8 and 9.
- Considering the intended audience, it should avoid using technical specialist/period specific terms without explaining their meaning.
- It should avoid using an overly simplistic dichotomy between primary and secondary contexts and explain that there is a wide spectrum of states of preservation.

Our more detailed comments are as follows:

**Executive Summary** – We agree that it is important to say on this page that contractors should consult with Palaeolithic/Pleistocene specialists.

**Structure** – It would be less confusing, easier to follow and more engaging if the chronological framework (section 7 and part of 6) appeared before the detailed focus on deposits and environmental information (5 and part of 6). The many pages of the latter so early on are a deterrent to reading the guidance and curators will be primarily looking for technical guidance to inform comments on pre-app advice, EIA scoping, DBAs, comments on planning applications etc. The deposits and environmental sections are helpful but would be better placed later in the document or even in an appendix. The sections which deal with the planning framework (section 4), approaches to investigation (section 9) and decision-making in the planning context (8 and 9) should be more clearly connected and perhaps follow on from each other. At present the two areas are very divorced and there is not enough focus on how the techniques and measures of significance should be properly related to the decision-taking process set out in the NPPF.

The document also seems unbalanced, some background sections (5 and part of 6) are very detailed, but the section that tries to get to grips with the task of curating the Palaeolithic (chapters 8 and 9) is comparatively brief. Most curators would prefer a shorter more concise guidance document in line with other technical guidance papers, although the detail of sections 5 and 6 is still useful and should be kept, perhaps in an appendix.

**Section 3** - Many non-specialists struggle with the various ways of expressing age/date used for the Palaeolithic period – it would be helpful to set out the chronological framework (and especially fig. 8) near the beginning. As examples - in the executive summary 1mya–11.6kya is used but in the main document c. 950,000–11,600 years ago is used; it would be helpful to express dates consistently. Similarly, in the introductory sections – e.g. section 3.2 there is discussion of Lower, Middle Palaeolithic and Upper Palaeolithic without any explanation of these terms – when were they and what differentiates them? Generally the introductory sections of the document seem back to front – the chronological overview should be first and then

the various deposits types could be discussed (and thus more easily tied back to the chronological framework).

**Figure 1** – A photograph of the Happisburgh footprints which includes a photographic scale rather than a camera lens should be used to show professional good practice.

**Section 3.1** - The examples of why Palaeolithic archaeology is important are spectacular, but these are crème-de-la-crème sites and not representative of the type of evidence commonly seen. It is easy to grasp why these sites are important, but it would be helpful, especially given the intended audience includes developers, if the guidance could state upfront why other evidence (deposit sequences, isolated faunal remains and artefacts in varying degrees of secondary contexts) are important – these are the discussions that curators are likely to be involved in regularly. This is covered elsewhere to some extent, but will consultants and developers read that far?

**Section 3.2** paragraph 1 last sentence – The term ‘primitive humans’ is outdated, value-laden and not in general usage – ‘early’ humans would be a better term.

**Section 3.2** paragraph 2 - Archaeology has been a material consideration in the planning process since 1987 when confirmed in DoE Planning Circular 8/87 three years before PPG16 – should rephrase this sentence.

**Section 4** – The latest version of the NPPF is 2019 and it is now the Ministry of HCLG not the DCLG. The NPPF is policy and non-statutory, it is accompanied by guidance; it is not ‘statutory guidelines’.

**Section 4.1** last sentence – It is not correct that only cave sites are Scheduled Monuments – there are two non-cave site Palaeolithic SMs in Kent.

**Table 1** caption – Use a term other than ‘guidance’ – the references are more background information than guidance which has a specific meaning in planning.

**Section 5** – In general this section seems too detailed and too close to the start of the guidance – see points above. However, as noted, some curators requested that the level of detail be retained, although it would be better placed in an appendix to avoid interrupting the flow of the guidance. The section would benefit from a rigorous edit to reduce sentence length and unnecessary words e.g. 5.2.2 sentence 3.

**Figure 3** is confusing and may have lost some key Pleistocene deposits in the Swanscombe/Ebbsfleet and other areas of the south-east. The figure is hard to follow at that scale but could give the impression that there is extensive Pleistocene interest in the north/north-west (due to extensive coverage of Till) – but conversely very little in the south-east (bar some small patches of Brickearth and the Clay-with-flints on the high downs)? C.f. Figure 3 with Figures 9/10. It would also be helpful to use clearer colour differentiation and perhaps to include Head deposits?

**Figure 4** introduces terms such as Anglian, Wolstonian and Devensian in the key and also refers to Marine Oxygen Isotope Stages, which haven’t been mentioned in the text before now, without explanation. So far dating has been expressed in terms

of years ago or Upper, Middle and Lower Palaeolithic (although without defining these). Similarly, Figure 5 refers to MIS and highlights hand axes and Levallois and Clactonian tool technologies, without any prior explanation of why they are significant and how they differ – it would be better to explain these terms before this figure is shown.

**Section 5.2.2** - This section should explain that sand and gravel deposits can contain artefacts and faunal remains which haven't moved far and are in good condition – the potential of these deposits is underplayed. Is there a reference for the last sentence?

**Section 5.8** - The use of terms such as *sensu stricto* and *sensu lato* does not help with readability and plain English terms (or descriptions of these terms) would be preferred.

**Section 5.10/5.10.3** – It would be useful to specifically mention the potential for fissures in the Lower Greensand.

**Figure 7** - Why are the regions labelled A, B, C, D? They don't seem to be referred to by these letters anywhere else in the document.

**Section 6** – As noted above it would be better to explain the key stages of the Pleistocene at the beginning of the guidance and move the detailed information on environmental remains and dating techniques to later in the document or an appendix.

**Table 3** – Deposit modelling – why only applicable to sedimentary sequences from multiple sites? Deposit models can be regional, from multiple sites in the same area or could be derived at the single site level.

**Section 6.2** Biostratigraphy and relative dating using artefacts – Should note the potential pitfalls and the need for a nuanced approach – earlier or later occurrences may be found, and absolute dates should be obtained wherever possible.

**Section 7** – As noted above this section would be better placed towards the start of the guidance.

**Panel B** – There is insufficient explanation of the knowledge which can be gained from artefacts from secondary contexts and that there is a wide spectrum of preservation from primary to secondary as opposed to two binary states. In this panel or elsewhere it is important to note that the geological processes involved in producing 'secondary context' sites will be of interest in themselves and need to be understood to determine site formation processes etc.

**Figs 12-19** - The various pictures of typical Palaeolithic artefacts in Section 7 should include scales. It would also be far preferable to show actual Palaeolithic artefacts – the captions seem to indicate that the ones shown are recently knapped artefacts? A wider range of more engaging photographs may be helpful cf the 1998 advice note.

**Figure 13** – A minor point but the Middle Pleistocene River Medway is too far to the east and has missed the Hoo peninsula.

**Figure 15** – Should explain that the numbers across the top of the trace are MI Stages. Should explain what fluctuations in  $^{18}\text{O}$  mean and/or add a unit of measurement to that side of the y-axis and add 'present' to the horizontal dashed line for sea-level.

**Section 7.4** second line – Should add 'apparently' in front of absent.

**Panel F** – Should add West Berkshire HER (HE Project No. 6633), Kent HER (HE Project No. 6637) and Essex HER (HE Project No. 6639) to the list of HER Palaeolithic enhancement projects.

**Section 8** bullet 3 – Again a too simplistic approach to primary and secondary contexts has been adopted.

**Section 8**, para 2 – humans are hominins – no need for the '/humans'.

Link at bottom of Page 47 – Need to remove 'Regional' from "National Regional Framework".

**Section 8**, para 7 – bullet 1 and 5 – should be 'hominin' not 'human'.

**Section 9** – As noted above this section should be more clearly connected with the earlier section 4 which considers the planning framework. It should be noted that all work in connection with the planning process needs to be reasonable and proportionate. A relatively simple flowchart might be helpful.

**Section 9.3** para 1 – Strongly welcome the recommendation of a deposit-led approach but this should be raised first in 9.2 the DBA stage. It may also be worth mentioning that a zoning approach to assessing Palaeolithic potential, which is reviewed iteratively, can be very helpful in identifying which parts of a site are considered more significant than others and fits well with the masterplanning approach used in planning decision-making.

**Section 9.3.1** – The term field assessment is used which presumably is meant to be a counterpart to desk-based assessment, but it would be easier (and fit better with understood terminology) to refer to 'field evaluation'. The division between evaluation and mitigation is more typical than field assessment and field mitigation. There is a reference to such work being 'commonly undertaken prior to the determination', but it is probably more commonly undertaken post-determination (although this will vary across the country).

**Section 9.3.1** – 'date' should be added to the list in line 3, and it may be worth adding that dating evidence is very important at the evaluation stage to help assess significance.

**Section 9.3.2** – There is a need to consider the decision-making process around identifying areas for preservation in situ and/or mitigation through excavation. Also are some sites so important that they should remain accessible to researchers rather than be buried/built over. This part of the decision-making process needs to be considered.

**Section 9.4** - The whole concept of assessment (in the usual post-excavation assessment sense) is missing from this section and should be added. In terms of the iterative approach and feeding information back to subsequent phases of work it is important that assessment is timely.

**Section 9** – This section should also consider the positive contribution Palaeolithic remains can make to local character and distinctiveness and explain how interpretation or public art could be utilised.

There is some way to go to make this guidance an appropriate and improved replacement for the 1998 English Heritage Identifying and Protecting Palaeolithic Remains advice note but we would be happy assist with or comment on revised text and to discuss any of the above comments in more detail if that would be helpful.

Yours sincerely

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(Heritage Conservation Manager  
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