

THE ARCHAEOLOGY FORUM

a grouping of independent bodies concerned with archaeology

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Duncan McCallum, English Heritage
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29 October 2009

Dear Duncan,

RESPONSE TO DRAFT PPS *PLANNING FOR THE HISTORIC ENVIRONMENT* AND DRAFT PLANNING PRACTICE GUIDE

Scope

This response presents an overview of the sector's reaction to the consultation from the Archaeology Forum's members and applies to both draft documents. For reasons that will become obvious, the Forum would prefer not to attempt to separate its comments and would be grateful if CLG and English Heritage could consider the entirety of this short response.

The Archaeology Forum

The Archaeology Forum is a grouping of the key, non-governmental organisations concerned with archaeology in the UK. This response represents the collective views of members of the Forum that have a remit for England and is supported by the Association of Local Government Archaeological Officers England, the Council for British Archaeology, the Institute of Conservation, the Institute for Archaeologists, the Society of Antiquaries of London, the Federation of Archaeological Managers and Employers, and the Society of Museum Archaeologists UK.

On 19 August the Forum submitted its provisional response to the consultation on these two draft documents. Since then Forum members have had more opportunities to discuss and understand both documents, including through seminars hosted by English Heritage and CLG, ALGAO, IfA and Heritage Link.

The consultation drafts

After fuller discussion with our members, we are pleased to stand by our initial welcome of the draft PPS. While there are weaknesses, some of which were identified in our preliminary response, we believe these may readily be addressed and should not delay the publication of the PPS as planned. Full details of the areas identified for improvement – and suggestions on how drafting might rectify them – are given in individual consultation responses from Forum members. The Forum would particularly like to draw your attention to

- The need to explain better in the introduction to the PPS how appropriate management of the historic environment, from buildings to floodplain landscape, can make major contribution to lessening or mitigating the impact of climate change; and the need to remove inappropriate references in policies that tend to set the historic environment in opposition to climate change objectives, and that could be interpreted as contradicting the positive policy principle in HE4.
- The need to anticipate the potential risks of employing new terminology, and a significance-based approach to assessing impact, without the overarching legislative framework of heritage protection reform for which these new concepts were developed. There are related concerns about the lack of supporting criteria, e.g. for selection for designation, and in complex areas such as managing the context and setting of heritage assets. Robust guidance in the Practice Guide and, above all, a strong commitment in the Government's joint-Ministerial Vision Statement will be required to support these potential areas of weakness.
- The need to emphasise the importance of quality in the policies, and to rectify – especially in the Practice Guide – the omission of references to tried and tested practitioner-generated standards for management of the historic environment in favour of frequently untested guidance produced by English Heritage. The omission of the quality dimension in the PPS and the lack of signposting in the PG on how to achieve it will leave at least some local authorities unable to achieve the government's third objective (para 5)
- The need to include in the PPS a policy (likewise underpinning the government's third objective (para 5)) encouraging public engagement with understanding of significance, as well as decision-making, and opportunities for community and amenity society involvement through out the planning process including the pre-application stages
- The need for the PPS to set a policy for ensuring that adequate provision is made for the deposition and curation of archaeological archives in a publicly accessible museum or resource centre

We would also like to encourage CLG and English Heritage to ensure that the valuable advice on conservation practice and legislation contained in Annex C of PPG 15, while out of place in a PPS, continues to be made available as authoritative guidance to local authorities.

While the Forum believes that only modest but significant changes are required to the PPS, the PG demands far more substantial revision, as detailed in Forum member responses.

It is clear that comprehensive redrafting is needed in some areas and we believe the best outcome will be achieved if English Heritage undertakes this in conjunction with key sector bodies and practitioners who have in-depth experience of managing the designated and undesignated historic environment in the adversarial context of plan-making and development management. Forum members are ready to devote substantial time and resources to playing a full role in this process, which should commence rapidly.

The Forum wishes government and English Heritage to understand clearly our view that it is imperative that the PPS, with the necessary improvements, is issued as soon as possible. Given the postponement of legislative reform, the additional deferral of planning policy reform for the historic environment would send a damaging message to local government about the relative unimportance of heritage protection placing many discretionary local authority services in a vulnerable position. Delay would leave plan-making and development management for the majority of the historic environment, which is largely undesignated, on a very fragile platform. Ideally the PPS should be issued with a redrafted PG, but any short, unwelcome delay in preparing the PG should not delay – or put at risk – publishing the improved PPS.

Yours sincerely,



Dr Gill Chitty,
Council for British Archaeology
Secretary, The Archaeology Forum

The Archaeology Forum's members are:

The Association of Local Government Archaeological Officers UK
The Council for British Archaeology
The Institute of Conservation
The Institute for Archaeologists
The National Trust
The National Trust for Scotland

Rescue: the British Archaeological Trust
The Society of Antiquaries of London
The Society of Antiquaries of Scotland
The Federation of Archaeological Managers and Employers
The Society of Museum Archaeologists UK