



**The Association of Local Government Archaeology Officers Response
to the Barker Review of Land Use Planning:**

ALGAO is the national body representing local government archaeology services at County, District, Metropolitan, Unitary and National Park authority level. ALGAO co-ordinates the views of its member authorities (106 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.

The historic environment is vulnerable to change, once destroyed archaeological evidence is lost for ever. Mitigation strategies can be developed for historic assets that are under threat, the broad approach is set out in PPG15: *Planning and the Historic Environment* (1994); and PPG 16: *Planning and Archaeology* (1990). Where preservation *in situ* cannot be achieved recording of archaeology by excavation or building analysis is possible. The historic environment can make a positive contribution to planning for new development and new communities, but needs to be assessed and integrated into the planning process from the start.

Introduction

ALGAO members are principally involved in providing advice to local planning authorities. We are thus intimately involved with the planning process, and recognise the government's concern for improving the planning system and to meet its sustainable development goals. The historic environment in general, and in particular archaeology, both above and below ground, has a role to play in contributing to development. The historic environment is invaluable in contributing to sustainable communities, by providing a sense of place, and providing themes and a focus for regeneration. At the same time this resource is vulnerable to inappropriate change.

We believe that it is possible to achieve an appropriate balance between economic, social and environmental objectives, and that the fundamental principles of the English planning system should allow this. Areas for improvement largely lie in the detail of how the system is implemented. For the historic environment, PPGs 15 and 16 hold good advice, and the Government has expressed its commitment to them. The forthcoming Heritage White Paper may well point the way to streamlining the system, and this will ultimately be enshrined in PPS15.

Annex 1 Questions

1. The new system of Local Development Frameworks appears to allow a degree of flexibility to the planning system. Whilst this is still being implemented, it is early days yet to see how frequently and readily these plans will be updated in response to changing circumstances. Some core policies, such as the protection of important archaeological remains, remain constant, but flexibility to accommodate new discoveries, or changed perceptions of importance, is also valuable.
3. The historic environment may well, in its own right, contribute to, amongst other things, the design of buildings and urban environments. The key here is to understand this at an early stage, not so much too little or too much weight being given, as the appropriate weight at the appropriate time. This can be achieved firstly by having the information available, by local authorities having historic urban or landscape characterisation in place for their areas, and for developers, or development agencies, to undertake early desk-based assessments for specific sites.
5. Greater information will provide greater certainty to business. The provision of information, such as historic area characterisation, site-based assessments, even to the extent of development agencies commissioning archaeological field evaluations or other forms of survey to prepare sites for marketing to prospective developers, will all reduce uncertainty. The information gained may have a positive marketing appeal. Ensuring that at the pre-application consultation stage prospective developers are made aware of all the factors a

development will have to consider, will give them a clear idea of the parameters they will have to plan within. Standard planning application checklists might be matched by standard pre-application checklists.

7. A good planning decision needs time to prepare and ensure that all factors are adequately considered. But this in turn can only be achieved by good quality information being submitted by the applicants. Here again a pre-application consultation checklist as well as an application checklist will ensure that the necessary range of information is provided with an application. Further guidance is however necessary on the range and standard of content submitted. Recent study of the content of EIAs;
http://www.planarch.org/downloads/library/england_eia-report.pdf
for example, has shown that the archaeological information submitted in them varies widely in scope and quality, and is more or less useful in enabling an informed planning decision to be made.

Adequate archaeological information may take some time to gather. Although desk-based assessment can be relatively rapid, it may take some time to secure further archaeological field evaluation, depending on the circumstances of a site. Although PPG16 suggests that this level of understanding is necessary to secure an informed planning decision, it is not always achievable pre-determination.

Site preparation activities, such as preparing brownfield sites for marketing, should always consider how to combine such activities with archaeological assessment, to enable early access and cost effective working and to avoid unnecessary loss of archaeological information.

8. Strategic provision of historic environment information, such as characterisation and other assessment set out above, by local planning authorities or other strategic development agencies, would usefully prepare the ground for potential developers, whilst at the same time not removing their obligations for site-specific assessments to inform their understanding of a development in its context. Historic Environment Records, held at County Council, or sometimes district and unitary authority level, at the moment, already provide the base-line data for such studies.

12. Archaeological advice provision to local authorities has largely been provided to England through County Councils, as being the most efficient, and certainly cost-effective, way of delivering such advice. Unfortunately we are seeing at present threats to such services as County Councils come under budgetary cuts.

Most District Councils in England would benefit from a Conservation Officer in house, to help champion the built historic environment and broader landscape, and to provide an efficient level of response to applicants. Whilst in an ideal world it might appear that an archaeology advisor might similarly be desirable in every District, it has been established that a cost-effective and efficient service can be delivered from an adequately resourced County Council service. The provision of Historic Environment Record data at this pan-district level is also strategically placed.

The vulnerability of these planning advice services to budgetary cuts has highlighted the need to assert that advice pursuant to a PPG has the equivalent of statutory status, that should a) be sought by local planning authorities, and b) delivered either at that local level or must be provided from a strategic higher level.

15. Economic performance in the regions can be enhanced in planning by identifying what is characteristic and special about that region and thus identifying, strengthening, and delivering a marketing 'brand', that attracts potential developers, businesses, and customers. The historic environment has much to contribute to this, not by continuously harking back to a past, but by creating local identity. Keynote sites may include ancient ones, but, with careful planning, these can sit alongside the new, to mutual benefit. This can be planned for in many ways, some of which are set out above.

We hope these comments have proved useful. If you would like further information on them, please do not hesitate to contact me.

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