

Newsletter

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PPS 5 Special Issue

Norman Redhead provides a guide to the thickets of the new planning documentation for English Archaeology....

Planning Policy Statement 5 – Planning for the Historic Environment

Introduction

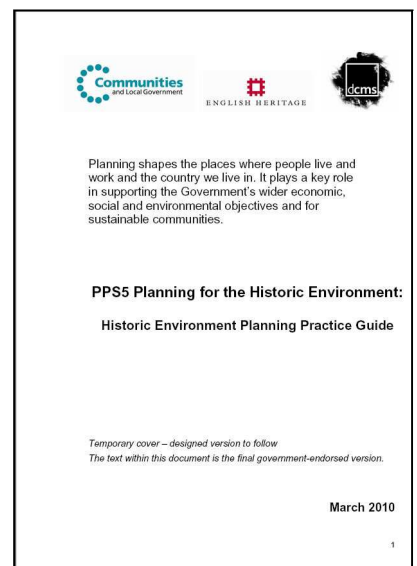
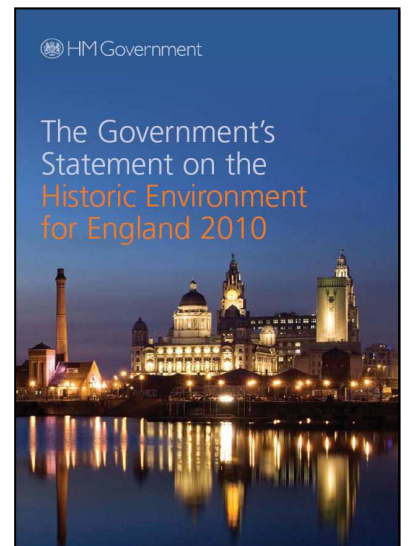
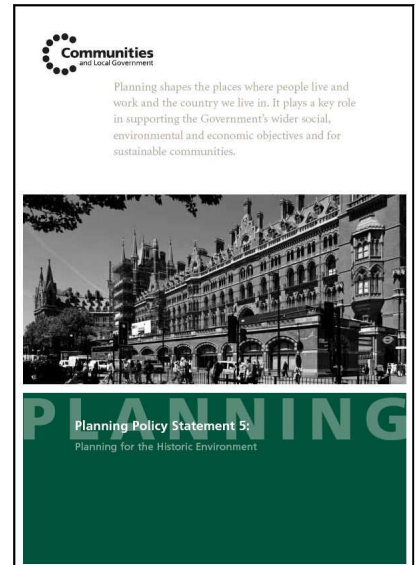
The Department of Communities and Local Government published the expected new Planning Policy Statement on 23rd March 2010. Re-numbered as PPS5, this high level policy document replaced Planning Policy Guidance Nos. 15 and 16 (Historic Environment and Archaeology) with immediate effect. It is supported by best practice guidance prepared by English Heritage entitled 'Historic Environment Planning Practice Guide'. HM Government have at the same time published a 'Statement on the Historic Environment for England 2010'. Copies of these reports can be downloaded at:

<http://www.communities.gov.uk/publications/planningandbuilding/pps5>

http://webarchive.nationalarchives.gov.uk/+http://www.culture.gov.uk/reference_library/publications/6763.aspx

Background

PPS5 is a streamlined, high level policy document designed to simplify heritage protection and management. Consisting of 12 policies, it puts in place c. 70% of the initiatives set out in the draft Heritage



This is a special issue devoted to the biggest change in the practice of archaeology in England for two decades. Whilst these changes may not affect the work of the Federation members directly, GMAU has prepared this issue for information as agreed at the Federation meeting in June. Normal newsletter service will be resumed with the next issue, for which contributions would be most welcome.

PPS 5 (cont)

Protection Bill and excludes those that would require changes to primary legislation relating to the Ancient Monuments and Archaeological Areas Act 1979 and the Planning (Listed Buildings and Conservation Areas) Act 1990. It separates out the key policies from PPGS 15 and 16 from the mass of detailed best practice. It is endorsed and underpinned through the Government's statement which sets out their vision for the Historic Environment:

'that the value of the historic environment is recognised by all who have the power to shape it; that Government gives it proper recognition and that it is managed intelligently and in a way that fully realises its contribution to the economic, social and cultural life of the nation'.

PPS5 introduces important new concepts in terminology and philosophy. Those parts of the historic environment with **historic, archaeological, architectural or artistic interests** that hold **significance** will be termed **heritage assets**. These 'incorporate all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora'. World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Parks and Gardens, Registered Battlefields and Conservation Areas are all now called **designated heritage assets**. The process of designation has identified them as having a level of significance that justifies special protection measures. Nothing in the PPS changes the existing legal framework for these designations. Other elements of the historic environment that have a heritage interest are termed non-designated heritage assets. These include: historic landscapes, buildings of local historic interest, artwork and non-Scheduled archaeological remains.

GMAU'S view on PPS5 – Improvements:

From an archaeological perspective, PPS5 has strong policies which provide better protection. For instance, the c 97% of archaeological remains that are not designated and which have very limited protection, are to be treated, under policy HE9.6, in the same way as designated heritage assets pending definition of their significance. It is recognized that there are many archaeological sites that are of potential national importance, it's just that the research has not yet been done. Some archaeological remains are not schedulable but their significance is recognized nonetheless, such as lithic scatters. There is better provision for post-excavation, archiving and publication (HE12) and for community engagement (para 138 of the Practice Guide). Where it is permitted to destroy or damage heritage assets, for instance where public benefit of redevelopment outweighs loss of heritage (see HE9.2 for this and other criteria for justifying loss), then a Local Planning Authority (LPA) should require the developer to 'record and advance understanding of the significance of the heritage asset before it is lost' (HE12.3). A planning condition will be used to ensure such work is carried out, and this will be based on a Written Scheme of Investigation. A condition can be worded in such a way that it sets out a logical, staged process of archaeological mitigation, so that developers can understand that finishing

a site excavation is not the end of the archaeological work; post-excavation analysis, report production, archive deposition and dissemination through publication etc are, of course, vital parts of the scheme of archaeology.

Much greater emphasis is placed on 'front loading' so that developers are required to undertake desk based assessments and evaluations *ahead* of submitting an application (HE6). The significance of the heritage asset has to be established and an understanding provided of the impact of development on that significance. This will allow archaeological remains to be properly identified and built into planning proposals at an early stage, reducing the risk of uncertainty for the applicant. The status of Historic Environment Records (HER) is improved as they are put forward as the first line of enquiry for would-be applicants, but other sources of information are quoted as well. The logic of this suggests that, before submitting an application, every would-be applicant should consult the HER to check for heritage assets. This raises issues of capacity for curatorial archaeologists but recognition of the importance of HERs is welcomed, and is in line with the proposal to put HERs on to a statutory footing in the Heritage Protection Bill.

Archaeological curators are already using a 'pick list' of PPS5 policies in commenting on the suitability of planning applications. Information requirements (HE2, HE6, HE7 and HE8), justification for loss (HE9), affect on setting (HE10), and investigation and recording (HE12) are key policies being quoted on a regular basis, in some cases to recommend refusal due to lack of required information on the identification of heritage assets and understanding of their significance.

Best practice and operational detail are provided in the Practice Guidance. Whilst this still needs improvement, it does allude to the Institute for Archaeologists' standards for historic building surveys, desk-based assessments, evaluations, excavations and watching briefs. However, it is recognized that the current standard document for desk-based assessments is not fit for PPS5 purposes. The Association of Local Government Archaeological Officers is working with the IfA to improve the Standards document for desk based assessments. The relative importance of archaeological remains used to be judged using criteria set out in Annex 4 of PPG16. GMAU are pleased to report that these criteria have become Annex 1 of the Scheduled Monument consent guidance document issued by DCMS in March this year.

<http://www.culture.gov.uk/images/publications/ScheduledMonuments>. The criteria are: period, rarity, documentation, group value, survival, fragility, diversity, and potential.

Annex 1 criteria are of course aimed at identifying national significance, but in applying them to all heritage assets with archaeological interest it is possible to gain an understanding of lesser significance as well, such as regional or local. This will be important for development planning in that it will inform decisions on which archaeological remains may be destroyed (after being recorded through policy HE12) and which must be preserved in situ. Archaeologists can also draw on a raft of research documents and strategies to help in judging significance. The North West Regional Archaeological Research Framework gives a regional perspective, whilst more urban surveys and research frameworks such as the Manchester City Centre Archaeological Research Framework are targeted on historic cores. HER based Historic Landscape Characterisation databases provide an understanding of the historical quality and legibility of landscapes. There are a number of thematic research publications, at national level, for example English Heritage studies on farms, schools, hospitals, the Monuments Protection Programme for type sites; and at sub-regional level, such as the Greater Manchester Textile Mills Survey and the Parks and Gardens Survey. Local heritage groups and individuals often have specialist knowledge of industrial processes, vernacular architecture, .

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Case Studies



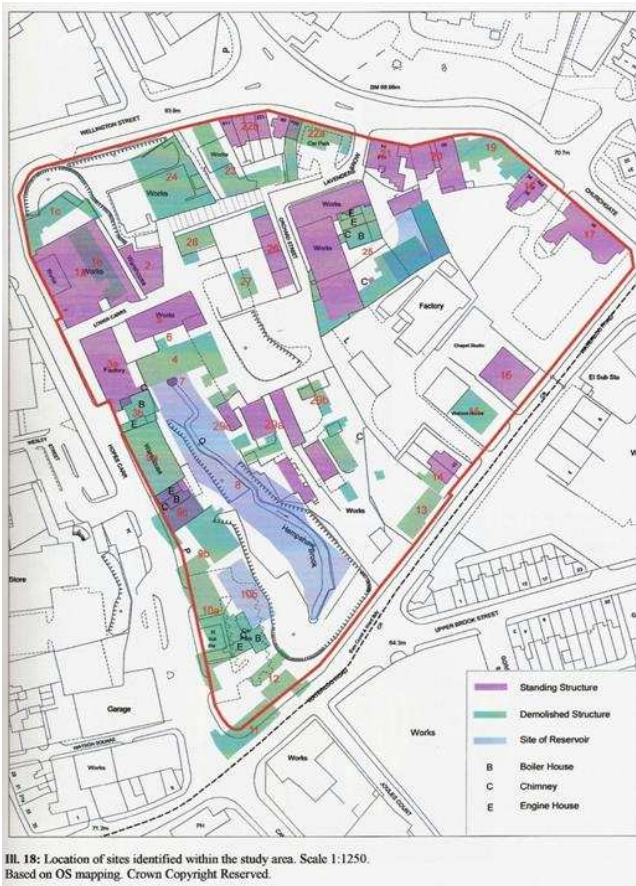
Co-op new headquarters site, Angel Meadow, Ancoats

Community engagement: Public open day at the end of Oxford Archaeology North's excavation at the new Co-operative Headquarters site off Miller Street in Manchester. Over 1,000 visitors came to view the remains. A popular archaeology publication, interpretation boards and display of remains in the public realm will provide a lasting sense of place and history for workers and visitors in this area.



GMPT Metro route, Pollard Street, Ancoats

Public benefit? A tunnel for the East Manchester Metrolink required archaeological excavation (by Northern Archaeological Associates) of impressive industrial remains at Pollard Street. In this case does the public benefit of the metro system outweigh the preservation of the archaeology?



Ill. 18: Location of sites identified within the study area. Scale 1:1250. Based on OS mapping. Crown Copyright Reserved.

Archaeological desk-based assessment for an extensive development site at Hopes Carr, Stockport (undertaken by the University of Manchester Archaeological Unit). This study was able to identify not only the sites of former buildings with industrial archaeological interest and relate them to the modern landscape, but also indicate the location of key archaeological features relevant to understanding significance, such as engine and boiler houses, water features etc. This is the level of information archaeological curators will require under PPS5 to inform understanding of the archaeological interest and evaluation trenching design.

Hopes Carr desk-based assessment location plan

and archaeological remains which can be invaluable in understanding significance. PPS5 calls for more work on synthesis so that commercial archaeology is better targeted, more efficient and therefore more reasonable for developers.

For instance in Greater Manchester, GMAU have asked for 44 investigations of early workers' housing from the industrial period, examining the social impact of rapid industrial and population growth during Manchester's rise to become the world's leading manufacturing centre in the first half of the 19th century. Should we be excavating every car park site that comes up for development because it is likely to have remains of cellar dwellings or back-to-back workers's housing or should we now take stock and work out which types of houses or which periods of housing are poorly represented in the archaeological record, so that development funded investigations are targeted to answer specific research questions?

The publication of PPS5 has come at a time when Local Planning Authorities are suffering, and will continue to suffer, extreme financial hardship. This will also affect archaeology curatorial services. On the one hand the timing could be seen as unfortunate because LPAs will struggle to implement the new policies effectively due to limited staff resources, on the other hand it could be seen as well timed in that it recognises the importance of the historic environment and the role of heritage professionals in the planning system. The introduction gives clear guidelines on how the government expects LPAs to deal with the historic environment by managing change intelligently.

Issues:

Terminology in the PPS reflects that contained in the draft Heritage Protection Bill and is at variance with the existing PPGs 15 and 16 and current legislation. Until the new Heritage Bill is enacted this incompatibility is likely to cause confusion and difficulties for developers, owners and local planning authorities alike. The Heritage Bill has cross-party support and is still expected to be brought forward by the current Government.

The PPS acknowledges that there will be resource implications for local authorities but assumes that these will be offset by efficiencies in the processing of applications. It is assumed that the new approach represented by the PPS will eliminate incomplete or inadequate applications, promote better quality applications and rapid decision making and reduce the number of appeals. We believe that the PPS under-estimates the likely costs arising from: enhancement of the Historic Environment Record to bring it up to the level required as first port of call for developer enquiries; providing adequate historic environment staff resources; and training of staff to implement the PPS effectively.

Developers are expected to provide evidence with their application that they have identified all heritage assets within the proposal area, and understand their significance and how that significance will be conserved. Adequate supporting evidence is essential to the preparation of good planning applications and the PPS establishes the key role of Historic Environment Records in providing evidence and expert advice. Developers will need to establish the level of information required, such as desk based assessments, historic building surveys, and in the case of archaeological remains, evaluation. This is likely to require a change in LPA practices, better resourcing for historic environment staff who will bear the brunt of this work, possible remodelling of the validation system and training for planners, administrators and members of planning committees.

PPS 5 (cont)

Community Involvement

In the Government's Vision Statement, number 4 of the six key strategies deals with public involvement, setting out the need to: 'promote opportunities to place people and communities at the centre of the designation and management of their local historic environment and to make use of heritage as a focus for learning and community identity at all levels'.

This is referenced in various ways in PPS5 and the Practice Guide. The latter sets out in paragraph 138 the ways in which archaeological investigations related to the planning system can and should, where appropriate, engage with the local community. It is worth quoting part of this: ...'The understanding gained from investigations will be of interest and value to local communities, special interest groups, schools and others. The results may contribute to a deeper sense of place and community identity. The process of investigation and recording, such as dismantling a building, or excavating a site, can be public interest in its own right and the discovery of new knowledge and understanding about their locality's history is valued by local communities. Community groups may be able to help. Opportunities for public engagement could, for example, include providing viewing platforms and interpretation panels, open days, public talks and online forums as well as coverage in local media. Once analysed, the results and the knowledge gained may well be communicated through displays, exhibitions and popular publications and might inform site design and public art.'

But there is also a recognition, in HE7.2 and 7.3, that the local community should take a more direct part in the planning process. The value a heritage asset's significance holds for today's and future generations is an important factor in how an application is determined, and a LPA should consult members of a community for which a heritage asset has special significance.

Conclusion

PPS5 is a welcome modernization of the PPGs 15 and 16. There had been a concern that, in merging the two into one slimmer policy document, archaeological interests and protection would be diminished. But in fact the opposite is true: archaeological remains are dealt with as an inclusive part of the historic environment but with recognition that for buried remains they are a special case. PPS5 changes approaches to archaeology in the planning process, creating the opportunity for archaeology to be seen in a positive light rather than the previous 'obstacle' or 'hurdle' that developers had to overcome. Its role in enriching communities, understanding and enhancing cultural significance is acknowledged. There is an opportunity for the discipline to unite in a collaborative approach and it is pleasing to note that the Federation of Archaeological Managers and Employers, the Institute for Archaeologists and the Association of Local Government Archaeological Officers have set up a commission to improve guidance for planners, standards in archaeological work, promote training, make commercial archaeology more efficient and proportionate through better targeted research, and realize the public benefits that PPS5 can deliver through better public participation in decision making and the archaeological process. PPG16 took a couple of years to bed in and PPS5 will in all likelihood take as long, especially given the dire financial pressures on local government. But its publication is a timely boost for archaeologists and the wider heritage sector.

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