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30 July, 2015

Dear Madam / Sir,

Consultation on the Historic Environment and Site Allocations in Local Plans

Thank you for the opportunity to comment on this consultation.

The Chartered Institute for Archaeologists

The Chartered Institute for Archaeologists (CIfA) is a professional body for the study and care of the historic environment. It promotes best practice in archaeology and provides a self-regulatory quality assurance framework for the sector and those it serves.

CIfA has over 3,250 members and more than 70 registered practices across the United Kingdom. Its members work in all branches of the discipline: heritage management, planning advice, excavation, finds and environmental study, buildings recording, underwater and aerial archaeology, museums, conservation, survey, research and development, teaching and liaison with the community, industry and the commercial and financial sectors.

The Association of Local Government Archaeological Officers: England

The Association of Local Government Archaeological Officers (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 (currently 97 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 its members embraces all aspects of the historic environment, including archaeology, buildings and the historic landscape, and its 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 Historic Environment and Site Allocations in Local Plans: Consultation Draft Advice Note

General

CifA and ALGAO: England welcome the publication of this draft Historic England Advice Note for consultation and recognise the importance of appropriate and timely consideration of the historic environment in the preparation of Local Plans in general and in identifying site allocations in particular.

However, we are concerned that the draft Note fails to provide clear and specific guidance on the approach to potential allocations which may have impacts upon heritage assets with archaeological interest. Such concerns may be addressed either by expanding the current draft to include such guidance or producing a separate Advice Note dealing specifically with archaeological interest (either solely in the context of site allocation or, which might be equally helpful, in relation to Local Plans generally¹).

Specific Comments

Under paragraph 1.3, 4th bullet point

Paragraph 152 of the National Planning Policy Framework (NPPF) refers not only to mitigation but also to compensatory measures which *'may be appropriate'*. It would be helpful to make this clear in this sub-paragraph, notwithstanding the 'in-principle' nature of the site allocation exercise.

Under section 2, Stage 1: Evidence Gathering

The need to consult HERs at the outset for all allocations is essential advice which does not appear in this section. Paragraph 169 of the NPPF, in addressing the need to use a proportionate evidence base, stresses that *'Local planning authorities should either maintain or have access to a historic environment record'*. The oblique reference to *'relevant ...evidence...listed in GPA 1'* is not sufficient for these purposes.

Paragraph 169 also refers to the need for local planning authorities to *'predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.'* The draft Advice Note fails adequately to explain the nature of archaeological evidence and the relevance of potential in the site allocation process.

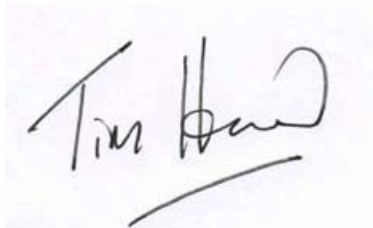
Under paragraph 2.2, 3rd bullet point

The reference to *'archaeological desk-based assessment and fieldwork'* in this sub-paragraph does not provide adequate advice and guidance on the need for

- desk-based assessments to identify material constraints before sites are allocated, especially those which have the potential to affect the principle of development. Of particular importance in this regard is the identification of nationally-important, undesignated assets, although, in some circumstances, the scale and density of undesignated archaeological assets of lesser importance can affect the viability of development
- archaeological field evaluation (in accordance with paragraph 129 of the NPPF) where potential constraints are identified. Further advice is needed, for instance, to explain the nature and extent of necessary evaluation in relation to proposed sites.

CIfA and ALGAO: England would be happy to contribute further to the development of this Advice Note and of any specific advice relating to heritage assets of archaeological interest. In the meantime, if there is anything further that we can do to assist please do not hesitate to contact us.

Yours faithfully,



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¹ This would supplement Historic Environment Good Practice Advice in Planning: 1 – The Historic Environment in Local Plans.