

Sandy Kidd
Greater London Archaeological Advisory Service
Historic England (London Office)
1 Waterhouse Square
138-142 Holborn
London
EC1N 2ST

sandy.kidd@HistoricEngland.org.uk

30 July 2015

Dear Sandy,

Consultation on Greater London Archaeological Priority Area Guidelines

Thank you for the opportunity to comment on these draft guidelines.

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.

Greater London Archaeological Priority Area Guidelines (Consultation Draft)

1. CIfA welcomes the publication of these draft guidelines for Archaeological Priority Areas (APAs) in Greater London. In particular, we welcome

- the development of a consistent strategic framework documenting archaeological interest for development planning across London seeking to regularize terminology and approach
- the production of guidelines which are compliant with the language and principles of the National Planning Policy Framework (NPPF)
- the formulation of new consultation guidelines to operate in conjunction with these guidelines and to ensure the effectiveness of APAs in practice.

2. The new provisions are appropriate for Greater London, given the large number of local authorities, the very high number of planning applications and the high proportion of urban areas that retain varying levels of archaeological potential.

3. The new consultation arrangements with the London Boroughs should also provide greater consistency of approach across Greater London and an efficient means of processing the large number of planning applications. Nevertheless, any criteria for consultation will need to be reviewed regularly in concert with the London Boroughs.

4. We are supportive of the development of a smart tool for rapid screening of development proposals but care needs to be taken that the details (including the conceptual model) at the bottom of page 12 of the draft are not taken on their own, and without further explanation, as definitive.

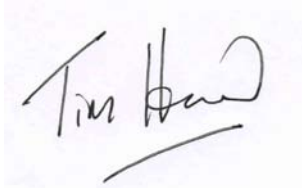
5. ClfA also supports the general principle of including all areas in one of the specified tiers. However, once again care needs to be taken not to mislead the unwary or those happy to be misled in the categorisation of tier 4. The guidelines, generally, make clear that sites within tier 4 are not devoid of archaeological significance and potential. However, the reference at page 6 of the draft, for instance, (*'Crucially APAs will be placed into three different tiers depending on their archaeological significance and potential, with a fourth tier covering all land outside a defined APA'*) might be contrasted by some with the opening of section 4 which states: *'Previously all parts of a borough were either inside or outside an APA. Under the new system all parts of a borough will be within an area that falls into one of four different tiers of archaeological significance and potential.'*

6. We strongly endorse the reference in section 10 (page 24) of the draft to the need to incorporate the appraisal in the relevant local plan. This is a key mechanism for ensuring the efficacy of APAs and their operation. It is appreciated that these are guidelines and not directions, but it would be helpful to recommend a consistent approach in this regard, lest different approaches are interpreted as involving differing requirements for consideration or protection.

7. Finally, it will be crucial, once the guidelines are introduced, for resources to be made available by Historic England and the London Boroughs to keep the areas up-to-date, reviewing new discoveries, taking account of new developments and adjusting boundaries where necessary at regular intervals. The Greater London Archaeological Advisory Service (GLAAS) will have a crucial role to play in the operation and up-dating of APAs which will not realise their full potential unless GLAAS is afforded adequate staffing and resources for this purpose and can continue to operate in accordance with ClfA Standards and guidance (<http://www.archaeologists.net/codes/ifa>).

ClfA would be happy further to contribute to the development of Archaeological Priority Areas for Greater London. In the meantime, if there is anything further that I can do to assist please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink on a light blue background. The signature reads "Tim Howard" in a cursive style, with a horizontal line underneath.

Tim Howard LLB, Dip Prof Arch
Senior Policy Advisor