



Planning Practice Guidance  
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3 October 2013

Dear Sir / Madam,

## **National Planning Practice Guidance – Beta testing**

Thank you for the opportunity to provide feedback on the National Planning Practice Guidance

### **The Institute for Archaeologists**

The Institute for Archaeologists (IfA) 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.

IfA has over 3,150 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.

### **National Planning Practice Guidance**

1. HERs: the section on HERs should explain that they are dynamic records that need to be actively maintained, and should be supported by dedicated expert staff
2. The focus on local lists is misleading: sites and structures do not have to be on a local list to qualify as heritage asset as defined by NPPF; further many assets with archaeological significance may not be known about before the application process and therefore could not have been on such a list at the point of application
3. The section on public benefit should state that while advancing knowledge is a public benefit identified as desirable by the NPPF, it is not a justification for development. We recognise that it's the latter point that leads the guidance to say nothing on this subject, but it would be more helpful to include public as a benefit and use words rather than silence to prevent any misinterpretation.
4. A statement on the use of conditions to secure investigations etc would be very helpful.

5. World Heritage Sites: we understand why guidance is needed here, but the disproportionate percentage of words devoted to them can convey the impression that heritage assets that aren't WHS are not of great import.
6. Design and access statements: the need for an archaeological desk-based assessment for assets with archaeological interest must be emphasised to avoid the standard for DBAs established over the years being undermined by that frequently applying to 'heritage statements'.
7. Underpinning guidance is essential, as there are key considerations omitted from this document. Draft text to cover these omissions and the handling of archaeological interest generally under NPPF has been sent to English Heritage. For that reason, therefore, we'd strongly urge retention of PPS5 PG as a live document for a limited additional period while a suitable replacement is finalised.
8. Ease of use: we can see what's intended, but it would be much easier if in addition to drilling down to specific areas of guidance one could also read a full text. This could be done with hyperlinks etc, and none of that should complicate frequent and easy updating. Paragraph numbering is essential if this guidance is to be cited, and again with a nested hierarchy updating could be achieved without knock-on effects to the numbering of unamended paragraphs.

If there is anything further that I can do to assist please do not hesitate to contact me.

Yours sincerely,



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Chief Executive, Institute for Archaeologists