

*Submitted by email*

[governmentadvice@HistoricEngland.org.uk](mailto:governmentadvice@HistoricEngland.org.uk)

10 May 2019

**Re: Consultation on Statements of Significance: Historic England Advice Note**

Dear Madam/Sir,

I am writing to you on behalf of the Chartered Institute for Archaeologists (CI/A) in response to the consultation on the *Historic England Advice Note: Statements of Significance*. CI/A have taken part in the discussions of the Historic Environment Protection Reform Group (HEPRG), which have discussed earlier versions of this guidance. We are disappointed that the guidance has been published for consultation in so similar a form to the previous version seen by the group. We remain concerned that the guidance is confused, repetitive, does not add much to existing guidance, and has the potential to enable applicants to continue to submit sub-standard products.

Our comments below set out why we feel this draft should not be published, and what alternative steps we would recommend for how Historic England should proceed. We would like to work to resolve the issues we perceive and would welcome further conversations to facilitate this.

**About the Chartered Institute for Archaeologists**

CI/A is the leading professional body representing archaeologists working in the UK and overseas. We promote high professional standards and strong ethics in archaeological practice to maximise the benefits that archaeologists bring to society and provide a self-regulatory quality assurance framework for the sector and those it serves.

CI/A has over 3,800 members and more than 80 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.

**1. General comments**

1.1. It was our understanding that this document was intended to provide detailed good practice advice to applicants on how to construct a statement of significance, describing the significance of heritage assets and the potential impact of proposed changes on that significance, so that informed decisions could be reached. We envisioned guidance which

would help all parties understand their obligations under the NPPF and indicate the professional standards that should be followed. We have emphasised that any guidance produced by Historic England (which we do not think is the appropriate body for this role) should not undermine the existing professional standard for archaeological desk-based assessment.

- 1.2. We do know from our members that guidance on assessing the significance of historic buildings is needed, as in practice this is regularly not undertaken to a satisfactory standard, and that in this sense it lags behind the standard for the production of archaeological desk based assessments. We also recognise the need for guidance to ensure that assessment of built assets gives due consideration to archaeological interest, as the absence of it is a common failing. Unfortunately, the draft document does not do this.
- 1.3. Broad guidance on how to assess significance is already published within GPA 2, which outlines (albeit briefly) why applicants must assess significance, and how this process fulfils requirements under the NPPF. As currently drafted, this document potentially could be distilled into a useful appendix to GPA 2, albeit in a streamlined form. However, it is our opinion that this document should not be published in its own right.
- 1.4. We fear that publication of this guidance in its current form would be potentially damaging to local authorities who would find it harder to ensure that statements of significance submitted by developer are of a suitable standard. The document has the potential to confuse and duplicate existing guidance in GPA 2. The language in the document is also too equivocal in several areas and may serve to undermine provisions in the NPPF and NPPG by introducing language which suggests certain activities (such as assessing impact on significance) are optional.
- 1.5. The guidance suggests that its purpose is to describe “ways to satisfy the obligation in the NPPF for LPAs to require applicants for heritage-related contents to provide information on heritage significance to help LPAs make decisions on the impact of proposals for change to heritage assets”. The guidance further states that ‘the purpose of this Historic England Advice note is to provide information on the assessment of heritage significance under the NPPF to assist owners, applicants, local authorities, planning and other consultants, and other interested parties in implementing historic environment legislation, the policy in the NPPF, and the related guidance given in the NPPG.’ In our opinion, the document is a confusing attempt to deliver on this purpose.
- 1.6. We also remain concerned that this document does not clearly stipulate that the archaeological interest of heritage assets (buried, submerged or built) should be assessed in line with the relevant professional (CIfA) standards – circumlocutions of the sort used in para 8, while intended to be supportive, are not. It would be better to do this rather than to paraphrase or modify some elements of this guidance and omit others.

1.7. The document is overly long, repetitive (both internally and of existing published guidance), difficult to follow, has an unclear structure and seems to have some paragraphs wrongly located, fails to highlight key information, and does not speak particularly well to any audience that we have considered.

## 2. Specific comments

2.1. The Summary and Introduction sections repeat information about the purpose of the document. The latter description of purpose is particularly long and confusing.

2.2. There are many areas in which the document is repetitive of content within GPA 2. E.g. paragraphs 4, 6, 10 and 17. Invariably, the wording in GPA 2 is more concise and clearer. GPA2 is cross referenced six times in the document, which should indicate the extent to which it is covering similar ground.

2.3. The document is also internally repetitive with paragraph 17 repeating paragraph 12. There are at least six references to the need for proportionality in assessing significance, including an entire subsection, four paragraphs in length. While this is a necessary point to make, the extreme emphasis and repetition is unnecessary.

2.4. Paragraphs 15-17 on 'archaeological evaluation' are confusingly selective of professional guidance. It would be better to include a simple statement that assessment of archaeological interest of all assets should follow the ClfA Standards and guidance and should be presented along with the assessment of other interests where professional guidance is less developed.

2.5. The section on design and access statements is long and convoluted. It could be slimmed down to one paragraph including a reference to NPPG guidance on design and access statements, and a note on how statements of seritage significance supports their purpose.

2.6. We understand that the NPPF does not prescribe a format for statements of significance, but this guidance was an opportunity to present advice on good practice, compensating for present widely variable standards and assisting by providing a national good practice standard. The inclusion of worked examples would provide a way to do this without being unduly prescriptive.

2.7. At present, non-designated heritage assets are often not addressed by practitioners in statements of significance. It would be helpful for this guidance to signpost the definition of heritage assets from the NPPF and to explain that non-designated assets must be considered when assessing significance (e.g. in paragraph 20).

2.8. The use of terminology such as 'below-ground archaeology' (para 8) is unhelpful, departing as it does from the way heritage assets are described in the NPPF and professional parlance.

- 2.9. In the second paragraph of the summary the document states “This advice note emphasises the *usefulness* of assessing significance as part of a staged approach to decision-making” (emphasis added). We are concerned that it is possible to read the meaning of the word ‘usefulness’ as indicating not necessary.
- 2.10. Similarly, paragraph 4 bullet point 3 suggests that a heritage statement of significance should “show an assessment of the level of significance and *might usefully* give a level of impact” (emphasis added). We would consider that it is imperative to include impact assessment.
- 2.11. Paragraph 9 is unclearly written and might be read by the uninformed that ‘Heritage Statements’ are referred to in planning law and guidance. This is not the case.
- 2.12. The wording of para 12 suggests that assessment of significance should be proportionate to an asset’s significance – an illogical circularity often cited but not present in the NPPF.
- 2.13. Para 28 also introduces the concept of proportionality being more desirable in some circumstances than others. This is logically flawed and should be re-phrased.
- 2.14. Para 20 uses ‘significance’ at least once where ‘interest’ is meant. Departing from NPPF terminology is unhelpful.
- 2.15. Para 28 refers to section of buildings of “secondary or tertiary date”. We would stress that it is not necessarily safe to equate age to significance. We suggest that these words are removed.

### 3. Recommendations

- 3.1. We recommend that this guidance is not published. We would support a thoroughly re-written and shortened version of this guidance to be incorporated into an updated version of GPA2, and we continue to advocate that more detailed guidance on professional practice should be given by professional bodies, not Historic England. A stand-alone document as hesitant as this is likely to discourage good practice, not improve assessments of heritage significance.
- 3.2. We are keen to work with Historic England, alongside other professional bodies to lead on this matter and are willing to reopen discussions with relevant institutes when invited to do so.

If ClfA can support you further in reaching a conclusion on this issue, please to not hesitate to contact me.

Yours sincerely,



**Rob Lennox**

*BSc (Econ) MA PhD ACIfA MCIPR*

**Policy and Communications Advisor, ClfA**