

Forum

Response to 'The National Planning Policy Framework and Archaeology: A Discussion'

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The CPRE believes good land-use planning is the unsung hero of environmental protection and, as defined by the National Planning Policy Framework (NPPF), the environment includes the natural, built and historic environment, of which archaeology is a part.

The historic environment cons of the NPPF have been set out in the article and, in terms of archaeology in particular, the move away from public and research benefits is a step back. But there are also positives that can be taken from the changes.

In the debates surrounding the consultation of the draft NPPF it was noted that planning policy documents were reduced from a length greater than the complete works of Shakespeare to less than 60 pages. In this context, by having a dedicated section three pages long the historic environment fared quite well. But acknowledgement of the historic environment goes further than this. Given the broad reaching nature of the topic, elements of its policy are spread throughout the NPPF, most notably in the design, climate change and plan making sections. Not only does this mean that the historic environment is never far from the mind, but it demonstrates and acknowledges the inextricable nature of the historic environment's place in planning concerns.

The design section could be of particular value to the protection of the historic environment as the design principles in the NPPF are strong and make good references to local character, history and distinctiveness. Archaeological remains are an important contributory component to local distinctiveness, often shaping and influencing both the development of urban areas and the character of the landscape through previous land-use patterns and archaeological remains. The challenge in getting recognition of the contribution and value of archaeological remains to local distinctiveness will largely come down to the strength of the local historic environment evidence base and local planning policies.

In terms of the evidence base, while all Local Planning Authorities (LPAs) should have or have access to Historic Environment Records (HERs), evidence can also include Historic Area Assessments (HAAs) and, perhaps of particular importance to archaeology, historic landscape character assessment. HAAs tend to focus more on the built environment and historic landscape character assessments look at the activities that have shaped the landscape. They therefore provide a means of recording and recognising archaeological impacts on the landscape and how this human intervention has influenced the character and distinctiveness of the local landscape.

However, it will not be enough to rely solely on the policy and the initiatives by cash

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strapped local authorities to undertake these assessments. Local interest groups with good knowledge of the archaeological resource will need to offer encouragement and expertise. CPRE will be campaigning to encourage local interest groups to participate in this and has published a series of briefings on the NPPF, including one on heritage and design and one on development plans to support groups through this process.

Key to ensuring adequate protection of the historic environment are the opportunities to include detailed policies in local and neighbourhood plans. The strategic priorities for the plans are directed to include the 'conservation and enhancement of the natural and historic environment, including landscape'. Furthermore, these plans should 'contain a clear strategy for enhancing the natural, built and historic environment...'. But, to ensure that the policies in local and neighbourhood plans adequately reflect the needs of archaeological and other historic environment priorities in their area, they will need both this strong local evidence base and the involvement of interested and

knowledgeable local people, who actively submit ideas on historic environment policies at the earliest stages of the plan making process and get involved at the consultation and the public examination stages of the plan. Neighbourhood Plans embody the Government's localist approach and offer a special opportunity for local communities to have greater influence.

While in principle the outlook seems reasonable for the built environment and archaeological conservation (if not the research benefits more broadly), in reality the challenge of getting strong policies in local plans and seeing them applied in practice is yet to be addressed. Demonstrating that the retention of a heritage asset outweighs the economic, social and environmental benefits of a major development may not prove easy!

Ultimately, planning decisions and case-law made under the new regime will show how heritage concerns and the conservation of archaeological remains fare in the new climate of a presumption in favour of sustainable development. Only time – and future archaeologists - will tell.