

Forum

The National Planning Policy Framework and Archaeology: A Response by RESCUE - The British Archaeological Trust

RESCUE*

The National Planning Policy Framework (NPPF) delivers a concise set of policies which the development industry can view (with some satisfaction given its brevity) as being the basic standard principles by which their work must be conducted. The core of sensible planning is here – care for the economy, consideration of the environment, quality of design and, crucially for our profession, conservation and enhancement of the Historic Environment. The authors (Joe Flatman and Dominic Perring) correctly highlight the very inclusion of heritage as a welcome advancement on previous regimes.

How far heritage concerns can be properly addressed during the planning process is not simply dependent upon having policies in place that require it to be, however. It also depends upon an appropriate knowledge base and professional expertise being available to the appropriate authorities to allow it to be taken into proper account. Put simply, this requires that adequate numbers of properly qualified staff will be needed at local planning authorities in order for the full requirements of the NPPF to be implemented. After years of neglect of the non-statutory advice and HER services at local

authorities, this expertise has been whittled away to crisis levels. This fragility of the surrounding network that supports archaeology and heritage is where the historic environment principles of the NPPF will now face their most stringent test.

On a practical level, how is the significance of a “heritage asset” to be assessed if there is a dearth of suitably qualified and experienced staff in post to examine planning submissions? Already, large numbers of Heritage Statements that are inadequate, misinformed or misleading are being submitted in support of planning applications, yet are being accepted by local authorities because the expertise to recognise their failings isn't available at the application validation stage. Furthermore, more worryingly, some authorities are actively encouraging the submission of developer-sponsored assessments and refusing independent scrutiny. This situation will inevitably lead to the loss of historic environment information. It could be viewed as an official green light for developers to assess the significance of their own sites from their own point of view - which would no doubt result in a downgrading of significance in the light of the ‘benefits’ of development and the consequential destruction and loss of actual archaeological sites and structures. This is a potential development free-for-all, which threatens the destruction of large areas of the historic environment, and it must be robustly addressed in the very near future.

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The inherent problem is that the heritage profession has lost control of much of the agenda nationally, and is now subservient to the requirements of the development sector and the whims of the politicians and the civil service when national heritage policy is being formulated. The challenge for the profession, in the light of the NPPF and its knowledge requirements, is to reassert its pre-eminent position as providers of not only the appropriately rigorous and independent information to applicants, but also the ser-

vices at local authority level that are essential to both inform and scrutinise it. There are opportunities within this challenge for a dialogue between the consultancy, curatorial and academic arms of the archaeological side of the heritage profession in particular, but this dialogue must be equitable, and it must focus upon establishing national statutory requirements for Historic Environment Records (HER) and Local Authority Historic Environment (LAHE) and Conservation Area Advice (CAA) services as a priority.