

Forum

NPPF and Archaeology: A Discussion

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'Steady as she goes'?

Flatman and Perring have demonstrated in this article that the NPPF has thus far engendered mixed emotions for those of us working in the historic environment sector, but they seem to suggest that the overriding sense is one of relief after a fearful consultation process; the stormy waters have died down and it looks like steady sailing ahead. However, perhaps the real problem lies in the fact that the promising winds of change have dropped too, and that our ship may be in danger of being becalmed.

Previous incarnations of planning policy for the historic environment (Circular 8/87, PPGs 15, 16 and PPS5) have been largely archaeology or heritage driven, and as such have not provoked such a sense of fear for our sector, perhaps popularly seen as somewhat of a minnow by other departments. The best historic parallel for the NPPF shake-up is possibly the introduction of the 1983 National Heritage Act, which was suspected of having been dreamt up by politicians in the Treasury, much like the NPPF. Then, as now, the sector was braced for serious impact, a crushing of extant ideology by outsiders, and it initially fought hard against it. As it turned out, worries were quickly eased and what the sector found, in English Heritage, was a new

platform to reform procedures and build advantages and new structures. This is an optimistic precedent for NPPF, but where the 1983 Act provided an opportunity to build on the previous regime's progress and effect further change for the heritage, the NPPF has rather knocked it off its stride just as it was absorbing a decade's worth of promising reforms that had culminated in the publication of PPS5.

The first thing that is important to stress is the new format for planning policies – being singular and holistic, rather than split into sub-categories with individual policy guidance areas. Flatman and Perring correctly identify this change in immediate breadth of policy for this single document as a source of subtle but significant change for archaeology and the historic environment. In fact, my overextended metaphor of the 'heritage ship' is no longer really appropriate, as we have now boarded a much bigger vessel, occupying a single cabin somewhere below the deck.

In real terms the NPPF may not be an enormous restructuring of planning powers, but practically the style and purpose of the document has created a different playing field, which may affect the future development of historic environment planning procedures. Much of the difference between PPS5 and the NPPF, in terms of what is or isn't included, is difficult to assess, given that we are dealing with this redefined field of application.

Officials no longer consult the depth of the individual PPS or PPG, but rather all information is read in the central document, which

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sets out the key strategy of planning policy with brevity like never before. The aim of this is to provide clarity and ease of understanding which, in fairness, it may well have done in terms of the day to day of planning decisions.

For instance, where we have lost the explicit aim of the 'presumption in favour of conservation', it has been subsumed into the holistic 'presumption in favour of sustainable development' – a single tenet of which relates to conservation. Given that the historic environment is included as part of this integrated vision, fewer mentions do not necessarily mean less significance. We cannot simply expect that in such a recasting of the responsibilities of planning we would keep the niche responsibilities defined in the same way, but practically, nothing should be lost from the previous conservation regime.

Other areas, such as commitment to the upkeep of HERs and local strategy (to replace LDFs) will indeed be key battlegrounds, especially relating to local and neighbourhood plans, where we are already seeing developers courting neighbourhood planning groups, (arguably in an effort to be part of the 'big society', but more likely sensing this to be the best way to secure hassle-free development options). Archaeologists, through English Heritage or through other professional bodies, need to do the same to ensure that the historic environment is given due recognition at the neighbourhood and local levels as these are the best arenas in which to secure protection for locally valued undesignated heritage. Perring and Flatman give a nod to each of these issues, but it is certainly worth echoing loudly and often for the benefit of the sector's future and for that of our valued local heritage.

What is worrying is the question of what may be the deeper consequences for sectoral vision. Looking beyond the NPPF's immediate impact on practice it is harder now to see what the ethics of historic environment practice within planning may be, with the new system seemingly providing much less

of a base for developing the innovative ideas relating to public value, engagement, and understanding brought in with PPS5. This makes planning significantly poorer, even if physical conservation of historic assets retains a similar protection.

It is a most astute observation of Flatman and Perring that the NPPF is 'entirely process driven'. So whilst there may be only a small level to which we can identify tangible loss in practice from PPS 5 to the NPPF, the great depth of ethical consideration that went into creating the PPS throughout the 2000s, which also led to the creation of English Heritage's Conservation Principles, the Heritage white paper and developed the idea of 'public value' for heritage and archaeology, can no longer be easily perceived.

The most explicit textual signification of this is the dropped requirement from PPS 5 to maximise 'knowledge and understanding' from heritage through planning. This is a greater loss that can be explained by simply looking at prospects for physical conservation of archaeological remains and heritage assets – which may well remain the same. But beyond this, it is hard to find any optimistic or innovative notes that might lead to the development of strategies for reaching the public, publishing results, and fostering social value that was the new key narrative in PPS5.

Broadly speaking, where PPS5 was a forward looking document containing a clear ethical message with a long genesis of intellectual development, the NPPF is brief, cold, and lacking the same style of commitment to the values of PPS5. Values have something of an ephemeral relationship to process, often taking time to sink in, time to become embedded with practitioners and time to begin providing the moral underpinning of action. PPS5 had less than two years to do this and it is difficult to tell how well embedded they have become within heritage planning.

The remaining hope is that there is guidance forthcoming from a cross-sectoral group of historic environment bodies being

produced under the guise of the Heritage Alliance's Historic Environment Forum. This guidance, out for public consultation very shortly, will be aiming to fulfill not only the practical shortfalls of the brief NPPF text, but also to capture some of the ideology of PPS5. The demand of the government is still for the utmost brevity – keeping the total pages of guidance at a fraction of what went before – but it is still hoped that the guidance will pick up any of the lost meanings and ideals of PPS5.

Recent drafts touch on a great range of issues of concern raised here by Flatman and Perring, such as HERs, social value, the importance of public engagement, knowledge sharing and using heritage to enhance understanding of the past. However, one point to consider is that this guide, unlike the previous PPS5 guidance, does not seem to be officially hallmarked with the DCLG or DCMS stamp and so will be entirely unofficial, meaning that it is likely to carry less weight within Local Authority decision-making than previous guidance.

However, it is also wise to note that in addition to the PPS5 guidance document which

is still considered to be an active document but which by necessity is largely redundant in its current form, is the 2010 Government Statement on the Historic Environment that still exists and is officially still an active document. Added to this, as Flatman and Perring identify, are the government's European commitments, most crucial of which is the Florence convention, or European Landscape Convention.

English Heritage also subscribes largely to the spirit of the Faro Convention, even though it has never been officially ratified by the government and now seems unlikely to ever be. And just as English Heritage has bravely continued to shape its own purpose in the ideological light of Faro and the Heritage white paper, despite failures by the Government to deliver them into law, one might cling to most of hope that if the sector sticks by its ethical commitments (i.e. to the 2010 government statement and to the English Heritage 'Principles') and doesn't lose sight of the progress it has made, that the historic environment might just continue to sail its own wind, without suffering from our new place in the revised planning system.