



Norfolk & Norwich Archaeological Society

Patron: Her Majesty the Queen

**Consultation Response – *Planning for the Future*
28 October 2020**

Since its founding in 1846, the Norfolk & Norwich Archaeological Society¹ has promoted and supported the archaeology and history of the county of Norfolk. Our members, whether amateur or professional, share a fascination for the past of the county, the place in which they live. The Society has long contributed to “place-making” in the county by narrating Norfolk’s rich heritage in its publications, public lectures and support for research. Archaeology is understood by the Society as the study of the historic environment, landscapes and people through time. All of the environment has been shaped and changed by people, and this legacy needs to be valued.

Planning for the Future proposes a radical and far-reaching revision to the planning system for England. We are concerned that heritage, and the centrality of archaeology to its understanding, needs to be recognised and indeed celebrated. Following from this we have several suggestions for future revisions. We note that planning guidance on archaeology was first offered in November 1990 (*Planning Policy Guidance 16: Archaeology and Planning*) following some high-profile scandals, including, famously, the threat to the Rose Theatre in London. Most professional archaeologists will have worked within its constraints. PPG16, as it was known, was an effective way of managing the potentially wide-spread destruction of archaeological remains by development. It did not cover all threats to archaeology and much has been lost to agricultural activity without any consistent financial support for its investigation or preservation. It was also less than clear about how information resulting from investigations should be disseminated, and provision for this was uneven and somewhat chaotic. PPG16 was replaced in 2010 with *Planning Policy Statement 5: Planning and the Historic Environment* which also replaced PPG15, focused on the historic built environment. PPS5 did not last long and was replaced in 2012 by the *National Planning Policy Framework* a more generic document with fewer explicit statements on heritage resources. It too was replaced in February 2019. These latter documents are much less clear about how archaeological remains should be dealt with, and the White Paper continues this trend.

We are deeply concerned that while work in advance of development has nevertheless continued, the fundamental importance of archaeological investigation and recording of our heritage may be side-lined in a rush for development. We urge you to recognise the importance of the historic environment explicitly. The consultation suggests planning regulation and practice is getting in the way of development, particularly of housing, and hence the economy, however, this remains an area of debate and not all agree that the current planning system is either broken, or the cause of a housing shortage. It does seem, rather, that speed of decision making and certainty for developers are the underlying motivations for the proposed changes.

¹ For more information on the NNAS see: <http://nnas.info/>

The interest in reducing complexity is welcome and has been attempted by governments before in earlier reforms to the planning system. The key proposal to increase efficiency is to place greater reliance on digital technologies. Our worry is that this probably underestimates the significant present use of IT in the planning system and at the same time overestimates the success of government led IT solutions to complex problems. We welcome the plan to change the way that developer contributions are obtained so that they do not cause delay. Also, we agree that improved modelling in local plans of what is acceptable in a particular area would be an improvement, but we query whether in many situations this is not already being achieved.

We welcome the statements about continuing to protect environmental and heritage assets, but this refers specifically to Green Belt, Areas of Outstanding Natural Beauty, National Parks, Sites of Special Scientific Interest and Conservation Areas, and not to areas designated (or otherwise identified) for their archaeological potential. We welcome the wish to be more ambitious for the places that are created through development, that they should deliver 'net gain' and not just 'do no harm'. We also welcome the wish to:

'promote the stewardship and improve our precious countryside and environment, ensuring important natural assets are preserved, the development potential of brownfield land is maximised, that we support net gains for biodiversity and the wider environment and actively address the challenges of climate change'.

But we are concerned that there are many very valuable parts of the historic environment that do not fall within these categories.

There is no reference to archaeology as fundamental to heritage, nor indeed as the discipline whose object of study is precisely the historic environment. This seems particularly odd given how much stress is placed rightly on place-making in the report (and that of Building Better, Building Beautiful Commission on which it relies so extensively). We suggest that archaeologically led zoning of the historic environment is a necessary precondition to sustainable and successful planning, and that wider protected landscape designations are necessary, in addition to the existing AONBs and National Parks, in both urban and rural areas.

The omission of a reference to archaeology is also problematic given the proposal that local authorities be required to designate all land into three categories – Growth Areas, Renewal Areas (where some development, such as gentle densification will be allowed) and Protected Areas. How can this be achieved without a thorough and systematic analysis of an area's archaeological heritage? Currently, this does not exist. Local authorities are clearly hard-pressed and have wide responsibilities. Archaeological and historic building expertise is patchy across the country, and, of course, the provision of in-house specialists is not a statutory obligation. Norfolk has an excellent historic environment service within Norfolk County Council but it has suffered significant reductions in recent years during austerity. Conservation Officer cover within district level local authorities is now almost as patchy. For example, Norwich's hugely important historic urban landscape is covered only by a skeleton team of conservation officers. Worthy and valuable national programmes for mapping the archaeological potential of areas, such as the National Mapping Programme, Historic Landscape Characterisation, Extensive Urban Survey and the Intensive Urban Survey for Norwich also remain partial and unfinished. In addition, funding for Historic Environment Records, which are so vital to the planning system is precarious. The essential information base is missing that will be

required to map areas designated for Growth, or indeed for Renewal, in the way the White Paper proposes. Our concern, therefore, is that local authorities are ill-equipped for the changes proposed and will be unable to designate land into the required categories without putting the historic environment at grave risk. We urge the government to make provision for the collection of the necessary data to allow for accurate mapping of the historic environment and to make Historic Environment Records a statutory requirement.

It should also be noted that under the Valletta Treaty of 1992, which the United Kingdom ratified in 2000, archaeological heritage must be protected from destruction through development. We urge that the scope and the intentions behind the Valletta Treaty are not lost in any revision to the planning system.

Furthermore, we ask that any legislation recognises that good development and place-making, is not just a matter of visual aesthetics but also of narratives, and of knowledge. Without an informed understanding of the historic environment and its development, effective places cannot be made. Furthermore, the things we learn about our places and landscapes, and the stories we can tell about them are fundamental to generating a sense of connection, of belonging and identity, as a great deal of recent research has shown. Thus, while archaeology of course informs good design, it also contributes directly to health and well-being.²

Thus, archaeology and the understanding of the historic environment that it provides is fundamental to the aims of *Planning for the Future*, as well as essential to their achievement in a number of ways. We therefore urge that greater consideration is given to archaeology in planning any new legislation. Indeed, we suggest that archaeology in its broadest sense should inform every stage of the planning and building process. Only by doing so will the admirable ambition of making places better be achievable. The members of this Society, like all archaeologists, are ready to help shape future planning in England through their knowledge, understanding and engagement with the historic environment.

Key points:

We urge you to recognise the importance of the historic environment explicitly and to define this and other terms used in the consultation.

We query the point that digital technologies are not currently being used effectively in the planning system.

We suggest that archaeologically led zoning of the historic environment is a necessary precondition for planning, and that more and wider protected rural and urban landscape designations are necessary.

We urge the government to make provision for the collection of necessary data to allow for accurate mapping of the historic environment and to make Historic Environment Records a statutory requirement.

We urge that the scope and the intentions behind the Valletta Treaty are not lost in any revision to the planning system.

² See for example the work of the Restoration Trust: <https://restorationtrust.org.uk>

We ask that any legislation recognises that good development and place-making is not just a matter of visual aesthetics but also of narratives based on the knowledge that archaeology produces.

Dr Andrew Hutcheson, MCIfA, President Norfolk and Norwich Archaeological Society

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