

24 February 2017

RE: Consultation on the Draft of GPA 3: Setting and Views of Heritage Assets

Dear Madam or Sir,

Thank you for the opportunity to submit evidence to this consultation. Our response relates to the concern that incorporating the methodology for assessing views into the guidance on setting is one which needs to be done with care. This is because there is a potential to introduce confusion as to the relationship with the concept of Setting as defined in national policy. At present, we have some concerns that the revised document does not do this effectively and that the motivation for incorporating guidance on views into the GPA is not clear.

Our key points relate to:

- The need for consistency in the use of language, particularly the use of 'setting' which, at all times, should reflect the definition and technical meaning defined with the NPPF
- The need to ensure that the relationship between the concepts of views and setting are clear,
- A need to ensure that, although setting of scheduled monuments has no statutory footing, that it is clear that it is still a material consideration in the planning process, and,
- The benefit of adding reference to the need for the use of appropriate expertise in assessment processes.

Detailed comments are set out below.

About the Chartered Institute for Archaeologists

CIfA is the leading professional body representing archaeologists working in the UK and overseas. CIfA promotes high professional standards and strong ethics in archaeological practice, to maximise the benefits that archaeologists bring to society, and provides a self-regulatory quality assurance framework for the sector and those it serves.

CIfA has over 3,200 members and nearly 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.

Detailed comments

1. Consistency and clarity of language

- 1.1. ClfA believes that all uses of language which has a technical meaning in national policy should conform to that technical meaning, so as to avoid any confusion arising out of a descriptive, rather than a technical usage. Specifically, in this document the key term of note is 'setting'.
- 1.2. For example, paragraph 7 states that 'new information on heritage assets may alter what might previously have been understood to comprise their *setting*' [emphasis added]. This would be clearer if it read 'new information on heritage assets may alter how the setting of an asset contributes to the asset's significance'. This is because setting, in its NPPF definition, relates to 'the surroundings in which a heritage asset is experienced'. This physical setting is not changed with new information, rather, it is the significance which is changed.
- 1.3. Paragraph 29 contains references to 'heritage values' which are not referred to or defined elsewhere in the document. Conversely this term is used throughout *Seeing History in the View*, and derived from *Conservation Principles*. It is not defined in GPA3 and as such the relationship between heritage values and setting introduces a potential confusion which does not exist in the current document.

2. *The relationship between Setting and Views*

- 2.1. The title of the document 'Setting and Views of Heritage Assets' suggests that this document is placing an equal weight on the latter as it does on the former. We believe that, for the purpose of this level of guidance, it is vital to make clear that the methodologies for assessing views are seen as a component of setting, not as an additional, separate concept.
- 2.2. This is important because the concept of setting is set out in both national legislation and policy, whereas the concept of views does not have any formal status. Rather, there are a number of ways in which assessing views can contribute to the assessment of setting, sometimes carrying great weight in that assessment. In all cases where views are relevant to significance, the impact on views will be a component of assessment of impact upon setting, and the recommendation of the impact on the historic environment will be determined with reference to significance.
- 2.3. Furthermore, the rationale for bringing *Seeing History in the View* together with GPA 3 is unclear, particularly since paragraph 14 references other guidance for landscape impact assessments which are recognised as being related to setting. In our opinion, advice of views could have been referenced in a similar way.

2.4. It is therefore suggested that:

- (1) 'and views' is omitted from the document title. If a different name to distinguish from the old GPA 3 is required, we suggest '*The Setting of Heritage Assets (including Views)*'
- (2) all references to 'setting and views' should be amended to 'settings', and

(3) paragraph 4 is amended to include a clear description of the subsidiarity of 'views' to 'setting' for the purposes of decision-making, in accordance with national policy.

3. *The setting of scheduled monuments and registered parks and gardens*

3.1. Paragraph 3 bullet point 1 highlights the statutory duty on decision-makers to have regard to the desirability of preserving listed buildings and their setting, and also states that there is no equivalent duty regarding for other varieties of designated assets. Whilst this is true, it would be helpful to state at this point that setting of scheduled monuments and registered parks and gardens are still a material consideration in the decision-making process. This could be done by inserting an extra clause within the parentheses, or by inserting a new bullet point to follow.

3.2. This would prevent the impression that it was only with regard to listed buildings that setting need be considered as part of the assessment of impact upon significance. This is particularly concerning given that for many scheduled monuments impact on setting will be the most common form of impact on significance.

4. *Other matters*

4.1. Paragraph 27 includes a list of important sources that should be consulted when conducting an assessment of setting. It would be helpful to point out that these are only suggestions, and that there are many other types of source which could, and in some cases definitely should be consulted.

4.2. Paragraph 34 could helpfully include a reference to the use of appropriate expertise, as set out in GPA 2 (paragraphs 18-20) – possibly utilising the format for 'pop-out boxes' used elsewhere in this document.

We hope that these comments are helpful. Please do not hesitate to contact us if you have any further need of assistance.

Yours faithfully,



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