

Archaeology & good planning

Summary:

Much of ClfA's advocacy work is focused on reactive issues and preventing negative change to existing systems of heritage protection, legislation, or policy. For example, on issues of deregulation in the planning system and the under-resourcing of local authority archaeology services. However, we are also constantly seeking opportunities to influence positive change. We have a positive vision for what good planning looks like, and how we think it can be achieved.

This briefing sets out some of the core principles of this vision, and looks at some current opportunities to deliver these long-term ambitions.

In summary, ClfA supports a planning system which

- is designed and resourced to deliver sustainable development,
- recognises the contribution that the historic environment makes to culture, society, the economy, and the environment
- puts the historic environment at the heart of ideas of place-making
- provides sufficient opportunities to investigate archaeological potential, avoid or mitigate harm to archaeological assets, and create public benefit from archaeology
- is adequately resourced to deliver good results

Note: This document is relevant across the UK, but focusses on English planning policy and examples.

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1. What does good planning mean?

[T]he historic environment is an asset of enormous cultural, social, economic and environmental value [which] makes a very real contribution to our quality of life and the quality of our places.'

(The Government's Statement on the Historic Environment for England 2010¹.)

The comprehensive planning system was substantially designed in the 1940s and was, at its heart, based on the public interest in ensuring positive decisions are made about development. It recognised that development affects people and that it was right that certain constraints should be placed on developers to ensure that development served everyone. It also gave people a say in the decisions, and gave the ultimate decision-making power to elected representatives.

Over the years, the system has recognised:

- Protections for the historic and natural environment
- Judgements about public amenity (e.g. safety, sanitation)
- Consideration of the scale of need (e.g. for housing, jobs, transport, community facilities)
- Judgements about character, design, appropriate land-use, etc.

The way to balance needs and protections has been refined over time, with the introduction of ideas of sustainability and an emphasis on public benefit.

With this in mind, we want to:

- Improve the balancing of sustainable development goals in practice
- Encourage more effective delivery of public benefits as a result of planning
- Seek improvements in terms of how we manage the environment holistically

Planning and the historic environment:

The planning system plays a key role in the management and protection of the historic environment (which includes archaeological remains both above and below ground). That role is not confined simply to designated assets. Over 90% of the historic environment is undesignated (i.e. not specifically protected by listing, scheduling or some other statutory designation) and is, for the most part, solely protected as a 'material consideration' in the planning process. The management and protection of the historic environment is an integral part of sustainable development as recognised by the National Planning Policy Framework (NPPF).

Archaeological remains (or more precisely in planning terms, heritage assets with archaeological interest) are a finite and vulnerable resource. Their precise nature and extent (and in some cases their very existence) are often unknown before sites are targeted for development. Consequently, dealing with sites which may have archaeological interest can be complicated in the planning process by the need to deal with the unknown. The application of expert judgement on a case-by-case basis is required if heritage assets with archaeological interest are to be properly managed and protected in the planning regime.

ClfA is committed to reducing the risks posed to the archaeological resource through the planning system and to promoting the value of heritage assets in planning. We are also committed to strong local authority historic environment services potentially with a statutory duty for planning authorities to have access to a professionally supported and maintained HER service.

¹ http://webarchive.nationalarchives.gov.uk/+/http://www.culture.gov.uk/images/publications/Acc_HeritageVision_Part1.pdf

2. Sustainability

Sustainability refers to a key concept that originated in the 1970s in environmental thinking. Broadly, it means;

'Development that meets the needs of the present without compromising the ability of future generations to meet their own needs'

(*Our Common Future*, The World Commission on Environment and Development 1987²)

The achievement of sustainable development in the public interest should be the primary objective of the planning system. The current (2012) version of the National Planning Policy Framework sets out a 'presumption in favour of sustainable development' which has 3 equal elements;

- **planning for prosperity (an economic role)** – use the planning system to build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type, and in the right places, is available to allow growth and innovation...
- **planning for people (a social role)** – use the planning system to promote strong, vibrant and healthy communities, by providing an increased supply of housing to meet the needs of present and future generations...
- **planning for places (an environmental role)** – use the planning system to protect and enhance our natural, built and historic environment, to use natural resources prudently and to mitigate and adapt to climate change...

For the historic environment this specifically means 'seeking positive improvements in the quality of the historic environment' (paragraph 9) and 'conserving heritage assets in a manner appropriate to their significance so that they can be enjoyed for their contribution to the quality of life of this and future generations' (paragraph 17). It also means that weight is given to the 'desirability of sustaining and enhancing the significance of all heritage assets (whether designated or not) and putting them to viable uses consistent with their conservation', the 'positive contribution that conservation of heritage assets can make to sustainable communities' and 'the desirability of new development making a positive contribution to local character and distinctiveness' (paragraph 131).

In current (2018) NPPF draft revision proposals, the way in which these three elements are balanced may be changing, potentially creating a greater ability to focus on benefits to a particular single objective. ClfA are concerned that this change in nuance may compound negative effects on sustainability which, both in the current and proposed new regime, is being increasingly undermined by deregulation and lack of resources. In some quarters there is a failure (or reluctance) to recognise that development which does not address the need properly to manage and protect the historic environment is unsustainable ([see our briefing on the relaxation of planning control here](#)).

How can we do better?

At the time of writing, ClfA are lobbying government on current plans to revise the NPPF to ensure that there is no weakening on sustainability principles. It is also important that we, along with the wider heritage sector, stand up for the principles that development is not sustainable if it erodes the historic character of a place, but rather seeks to enhance it. We are also participating in the Raynsford Review of Planning and will be using the Review as an opportunity to talk broadly about the benefits and values of a positive planning system.

We should seek high quality, sensitive developments, and not be duped into accepting poor quality place-making in the clamour to let developers build high, fast, and cheap.

² www.un-documents.net/our-common-future.pdf

3. Public benefit

The historic environment is commonly described as a resource, with individual heritage sites, objects, or buildings known as ‘assets’. These resources are generally considered by local and national government, by experts and by society as a resource capable of producing public benefits.

The fact that archaeologists create benefits for both society and the economy is a core basis for ClfA’s incorporation by Royal Charter.

There are many ways in which archaeology can create public benefit, but some core principles archaeologists can use to design benefits centre on:

- **Knowledge gain:** Research activities which advance understanding about the past and contribute to the sum of knowledge are a core public benefit of archaeological work. Recording alone cannot justify loss of an asset, but exploring new findings and ensuring access to materials and data for further research is a benefit of archaeological work. Knowledge gained can go on to be a material for public benefit creation in many other ways.
- **High quality research outputs:** Research outputs like publications, exhibitions, or events engage people and inspire social or cultural benefits.
- **Interpretation:** How we tell stories is a key way to engage and inspire people.
- **Improvements to quality of place:** Archaeological work can leave lasting positive impacts on the landscape, or lead to changes in management practices or valuation of particular landscapes.
- **Community:** Archaeology can be a mechanism for developing community values, through increased pride and sense of place. Heritage activities may also provide opportunities for communities to better understand their areas as well as other people.
- **Health & well-being:** While not unique to archaeology or heritage, tangential therapeutic or social benefits can accrue from archaeological activities; for example, exercise, meeting people, and being outdoors are all recognised health & wellbeing benefits which can accrue to participants.
- **Skills:** Another related benefit to archaeological activities is the skills that participants learn.

Archaeological processes which understand and use historic environment resources in these ways can develop benefits across all three areas of sustainability – economy, society and environment. It is the responsibility of archaeologists to help to design and realise this potential.

Archaeology and environmental benefit

Environmental benefit can be secured through retaining and enhancing the historic landscape and managing and protecting heritage assets, such as monuments and archaeological features. The appearance of a new development can sometimes be improved by the conservation and reuse of buildings and spaces. This can make a place more desirable to live and can also have valuable knock-on benefits for other aspects of the environment, such as energy efficiency.

Enhancement of the historic environment often takes place hand in hand with ecological and landscape conservation, providing more green space and biodiversity, both desirable for sustainable development.

Archaeology and economic benefit

Economic benefit derives from the regeneration of historic places, often leading to revitalisation of surrounding communities and neighbourhoods. Reinforcing historic character, reusing historic fabric

and maintaining locally distinctive patterns of development can play a significant role in supporting local economies. Archaeology can contribute substantially to place-making – enhancing the image of a place, making it somewhere people want to live and so increasing the potential income it can realise, through tourism, increased property values, greater retail value, etc. The World Bank positively encourages development that looks to preserve cultural heritage because of the benefits that understanding and enhancement of cultural significance or ‘cultural capital’ have on the value of other economic projects and assets. Historic buildings and places can also provide the opportunity for types of commercial activity that might not otherwise be possible, providing additional economic activity and new employment opportunities for local people.

In the UK and abroad the historic environment plays an important role in tourism, providing focal points and venues for visitors, creating jobs, and supporting business on the local and national scale, stimulating small and medium-sized enterprises, developing new markets and encouraging inward investment.

An archaeologist can tell you what it is about your city or community that makes it historically interesting and distinct, its contemporary cultural importance and where the potential lies for development and enhancement of the historic benefit.

Archaeology and social benefit

Social benefits can be closely linked to the historic environment, in particular benefits for individuals through learning and development and the ability to acquire new skills (such as volunteering). Community strength and cultural identity can be enhanced through contact with the historic environment – in particular through community heritage projects. These projects have the ability to engage diverse groups of people, from refugee groups to the homeless, young offenders and injured service personnel, offering new skills, confidence, the opportunity to become an active citizen and to connect with a shared human past. There is also evidence that engaging with the historic environment can make a significant contribution to community well-being and promote social capital, leading to improvement in health, wealth and education. A professional archaeologist can tell you how to approach the investigation of the historic environment with the widest public benefit.

How can we do better?

The importance of the creation of public benefit as a reason for archaeological investigation has been embedded within planning policy since 2010 with the publication of *Planning Policy Statement 5* (now part of the *National Planning Policy Framework* - NPPF) and has been a focus of the sector over the subsequent period. [See discussion of the public benefit of development-led investigation in the 2011 Southport Report.](#)

However, while changes to national policy have instituted positive principles regarding delivering public benefit as a result of planning-led historic environment management, in practice they have not always been effectively translated into planning norms.

There are numerous examples of good practice, but the mind-set of many is still influenced by out-dated principles such as ‘preservation by record’ as the standard approach to quickly and cheaply removing and archiving archaeological material with little in the way of public benefit. The huge potential for analysis, dissemination, publication, and public engagement is still, on the whole, not commonly capitalised upon in much planning-led archaeology and conservation work.

4. Place-making

One of the key drivers of the planning system is to shape our towns, cities, and countryside in order to create better places to live. Place-making is a broad way to describe the processes of planning, designing, and managing change to places. Heritage and archaeology are key contributors to this process, because seeking to shape a place inevitably requires an understanding of what is already there, where it came from, and how and why it is valued. We support putting heritage at the heart of place-making because historic places are more likely to be unique, beautiful, and inspire passion and pride, as well as providing many economic advantages³.

Place-making is a collaborative process which must involve communities, drawing on their values as well as their patterns of use, and future needs and desires. As such, place-making speaks to the core values of public participation which are at the heart of the planning system's purpose.

Heritage and archaeology are utilised as part of place-making in range of ways:

- **Local plan policies** are informed and shaped by historic area assessment or historic landscape characterisation,
- **Community-led heritage stewardship** involving heritage professionals can improve place through management agreements for sites and places, community archaeology, or heritage interpretation,
- **Localism tools** such as Neighbourhood Planning and other policies are a way to develop local-level policy protections and protect local historic assets or character,
- **Development management** contributes to place-making where archaeologists work with clients in the design process to create developments which preserve or enhance heritage significance and provide opportunities for consultation and engagement with communities,
- **Research** is also an important way in which archaeology support what is known about a place, and therefore what should be preserved and how,
- **Investment** in conservation and heritage-led regeneration can also stimulate place-making.

How can we do better?

Since 2010, England's planning system has seen a significant relaxation in planning regulation in order to accommodate an agenda for housing growth. Many organisations, including ClfA, the National Trust, the Campaign for the Protection of Rural England (CPRE), the Town and Country Planning Association (TCPA) and many others have complained that the system is unsustainable. ClfA is currently engaged with the Raynsford Review of Planning which seeks to explore key questions of the role and purpose of planning and show how we can deliver better placemaking through a fairer and more effective planning system.

However, it is also important that we work, through the mechanisms that we do have in the sector, to ensure that the benefits of place-making are highlighted to government. ClfA seeks to ensure archaeologists have the skills they need to delivery place-making objectives, and that positive examples are widely celebrated.

³ <https://www.hlf.org.uk/new-ideas-need-old-buildings>

5. Integrated environmental management

In addition to the planning system, another major sphere which affects archaeological heritage assets is agricultural policy and land management. The most influential tool in this regard, is agri-environment schemes. These schemes are voluntary agreements which landowners enter into for a number of years, and are currently delivered through the Common Agricultural Policy's (CAP) Pillar 2 funding. They provide subsidy for farmers in return for positive environmental benefits.

In addition to options for wider environmental goods, like habitat restoration and flood prevention, historic environment options exist, including management of the effects of cultivation or erosion on archaeological sites, restoration of historic field boundaries, and grants to repair historic buildings.

Currently, CAP has an important impact on archaeology as it has, since 2000, provided a system which encourages and funds farmers and landowners to draw up management agreements which enable better and more sustainable environmental management on their land and provides a platform for consultation with and monitoring by government advisory bodies.

These agri-environment schemes have been instrumental in improving protections for rural archaeological assets in the past 20 years and it is critical that the UK continues to support an integrated approach to rural land management which safeguards historic assets. The CAP currently funds more than £90 million per year to historic environment protection in the UK annually, making it one of the biggest sources of funding for the historic environment.

It is ClfA's view that it is vital that agri-environment schemes continue to include the historic environment as part of an integrated approach to land management, which recognises that it is virtually impossible to separate the cultural from the natural in the UK's landscapes, as virtually every place has been shaped by human hands in the past. An understanding of the archaeological and cultural heritage of landscapes and their uses is beneficial to holistic understandings of place, which in turn promote community involvement, public benefit, and sustainable-land management.

How can we do better?

Government is currently developing a replacement for the CAP which will be implemented after Brexit. This scheme is proposed to be focussed solely on the provision of subsidy in return for environmental public goods. At present, heritage is embedded in these proposals and ClfA are involved in lobbying to ensure that the correct provisions are designed and put in place in new legislation and policy implementing these plans.

In the past, however, there has been a historic undervaluation of cultural heritage in the design and application of agri-environment schemes, with small amounts of funding available, and a lack of expertise and inclination in Natural England to get the most out of the historic environment.

ClfA are working with colleagues across the historic and natural environment sector in order to;

1. Promote proposals to phase out per-hectare support for farmers (the 'basic payment') and support funding should be for environmental public goods through a new Environmental Land Management System which incentivises land managers to restore and improve our natural capital and rural heritage.
2. Ensure the new system is not bound by some of the limitations of the old; namely that it focussed on areas regulated by EU Directives (to the exclusion of heritage) and that it is implemented without sufficient historic environment expertise. We will be seeking a system which puts the historic and natural environments on an equal footing, and will be helping to design pilots for this from 2018-19.
3. Ensure that the new Agriculture Act maintains and updates the 1986 Act, which includes specific protections for assets of archaeological interest and ensure that the social and economic interests of rural communities, and public enjoyment of the countryside are considered a core purpose of the new system.

6. What can we all do about it?

As archaeologists many of us have opportunities to reflect on these core principles without our roles. We must remember our obligations to the public in our work, and ensure that we understand the principles underpinning concepts of sustainability and public benefit in the planning system. If all ClfA members were able to push for incremental improvements in how we deliver on these ambitions, we can enhance expectations, and build an evidence of positive effects with which we can lobby for further changes.

ClfA members also have opportunities to influence local and national decision-makers, through direct advocacy. Writing to your MP is a good place to start. [You can find guidance on this, produced by the CBA.](#)

Do you have specialist knowledge of this or other policy areas?

Volunteer to be a consultant on ClfA policy in this area and help us shape our advocacy.

Email rob.lennox@archaeologists.net for details.

For further information about ClfA's advocacy and campaigns and for details on other priority areas, visit www.archaeologists.net/advocacy or email admin@archaeologists.net.