

Geraint.Franklin@HistoricEngland.org.uk

31 January 2016

Dear Geraint,

RE: CIfA response to consultation on the Draft Historic Areas Assessments guidance

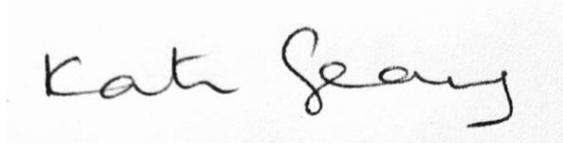
Thank you for consulting CIfA on the draft Historic Area Assessment Guidance at this stage of its development. We are pleased that you have expressed an interest in CIfA's views on the document, given the potential relevance of Historic Area Assessments (HAAs) to CIfA's professional members. In addition, you have raised the possibility of jointly badging the advice. We are, in principle, open to this. However, we have a number of comments that it will be necessary to address for us to be confident in doing so. We expand on this with detailed comments below, but in short, these are;

- While we understand that this guidance document is intended to be accessible by a wide range of users, we think it is necessary to ensure that the terminology used fully reflects language used in the planning system, particularly terms used in the National Planning Policy Framework (NPPF), if it is not to add confusion to requirements for professional users,
- It would be helpful for greater detail to be included for those stakeholders for whom the document is meant to provide strategic advice for specific development contexts. This may be achieved through the insertion of an 'advice to professionals' section, which includes all necessary technical information for using HAAs in these contexts. It would be perfectly possible to do this without harming the overall accessibility of the document.
- The guidance needs to be in full conformity (and specify the need to comply with) existing CIfA standards, for example those on Desk Based Assessments (DBA), and any other relevant professional guidance,
- It would be useful to ensure that there is clear recognition of the range of uses for the assessment, including the suitability of different levels of assessment for these uses,
- There is potential for greater explicit reference to processes of archaeological assessment, including an assessment of what the HAA does not deliver, e.g. an understanding of what is below ground, and what the next steps would be to acquire that knowledge.

All this being said, we think that the document is an interesting and useful one which contains a great deal of helpful guidance on this methodology for understanding historic places.

Please do not hesitate to contact us if it would be useful to discuss endorsement of a revised version of the guidance, or if we can be of any other assistance.

Yours sincerely,

A handwritten signature in black ink that reads "Kate Geary". The signature is written in a cursive, flowing style.

Kate Geary
Standards Development Manager

Detailed comments

1. Purpose of the document

- 1.1. A statement of the purpose of the document should be included in the initial summary and greater clarity given on how the guidance could relate to the range of uses for which it is intended, for example, in development contexts, neighbourhood planning, etc.
- 1.2. Paragraph 1.1. gives very little clarity on what the purpose of the document is. While it is recognised that the document is intended to have a wide range of potential users, it is hard to judge its usefulness even in a broad sense from this introduction.
- 1.3. In our minds, the purpose of the document is to introduce the useful HAA methodology for undertaking area-based research and to present the information necessary to adopt the methodology which could form part of an approach to, for example, producing a Desk Based Assessment (DBA) as part of a planning application, a characterisation plan, a conservation area appraisal, or a local or neighbourhood plan.
- 1.4. For professional users, understanding how this guidance relates to the National Planning Policy Framework (NPPF), National Planning Practice Guidance (NPPG), Historic England Good Practice Advice notes (GPAs) would also be useful (either here, or noted and signposted in the separate section).
- 1.5. Furthermore, a list of other sources of guidance should be signposted to ensure that users are aware of any other necessary standards they should be conforming to, in order to confidently be able to use an HAA effectively in any of the above mentioned contexts. This list of documents should include existing CifA Standards and Guidance.

2. Terminology is not consistent with the language of the planning system

- 2.1. We are concerned that the document does not use language which is consistent with the planning system. We recommend that the terminology used is examined closely and appropriate changes agreed to bring it into line with NPPF and NPPG.

- 2.2. For example, “outlines the archaeological potential of an area” (para 1.4.1.) should be replaced with “identifies the potential for archaeological interest in an area”.
- 2.3. It should also be noted that, in places, terminology which reflects criteria for assessing Listed Buildings is used in relation to wider landscape assessment, and this is not necessarily appropriate. We would suggest that terms such as ‘historic and architectural importance’ are only used when directly considering the significance of historic buildings with the more appropriate term ‘significance’ substituted in all wider contexts.
- 2.4. For example, “describes ‘character areas’ and assesses their relative historic and architectural importance” (para. 1.4.1.) should be replaced with “describes ‘character areas’ and assesses their relative significance”. An additional bullet point could be added as follows; “describes the relative historic and architectural importance of historic buildings and their contribution to ‘character areas’”.
- 2.5. The concept of significance is key to processes of conserving and enhancing the historic environment in the planning process, however, it is not referred to consistently in the document. For example, references should be made in paragraphs 2.2.1. and 2.3.1.
- 2.6. Paragraph 1.4.2. states that HAAs provide “a sound evidence base for plan-making”. This is not true unless terminology is consistent with the planning system, as it could end up adding confusion. However, with careful drafting, and possibly the addition of pop-out boxes with advice for different types of user, it would be perfectly possible to do this without making the document less accessible to other types of user.

3. *Suitability for professional users*

- 3.1. It is important for the guidance to set out under section 3 which levels of assessment are appropriate for particular tasks. Lower levels of assessment may not be appropriate and guidance should not be seen as encouraging a lower standard of work than is prescribed by professional standards or by planning guidance, as set out elsewhere.
- 3.2. Paragraph 1.6.4. requires appropriate qualifications to be given where it states that HAAs can be used to “assist in meeting government objectives for sustainable development as set out in the National Planning Policy Framework”. For instance, by adding “where part of a proportionate scheme that conforms to professional standards”.
- 3.3. It may be useful, for example, to include an addition bullet point to paragraphs 3.2.4, and 3.3.2. to the effect of “it will not be sufficient to inform plan making, development management decisions, or decisions relating to brownfield registers”.

4. *Definition of historic area*

- 4.1. The definition of historic area provided in paragraph 1.1.3. does not actually define the term ‘historic’. This is not necessarily a problem, as the process of an HAA could yield information about historic character of virtually any area, even if is not a ‘high quality’ historic environment, following the principle of the European Landscape Convention (Council of Europe 2000). However, if this is the intention, we would welcome that it is stated more clearly.

- 4.2. Paragraph 1.7. appears to support a wide definition of historic landscape, but again, a paragraph to state clearly the position that any area *can* have historic interest would be beneficial.
- 4.3. Paragraph 2.2.1. exposes where a lack of clarity in this regard leads to a potential limitation of use of HAAs. If a full range of users is imagined, a HAA could be used in *any* area for the objective of assessing even comparatively low quality historic environments. For example, a neighbourhood planning forum may wish to undertake an HAA to inform a sense of local pride and distinctiveness, even it is unlikely to reach a level of distinction necessary for designation as a Conservation Area.

5. Current planning reform

- 5.1. In the light of the forthcoming implementation of the Housing and Planning Act, it may be pertinent to add to paragraph 1.6. “identify areas that should not be identified for development on a Brownfield Register, local plan, or neighbourhood plan”.
- 5.2. Brownfield Registers could also be specified under paragraph 1.6.2. bullet point 5, and paragraphs 3.2.4 and 3.3.2 (see paragraph 3.3 of this letter, above).

6. Procurement and accreditation

- 6.1. The boxed-out feature on commissioning HAAs is unhelpful, as it implies that tendering is the only or preferred method of procurement.
- 6.2. Recognition in the list of bullet points in this box feature should also recognise that; “The professional standard should be met”.
- 6.3. The fifth bullet states, on the criteria for selecting contractors, “these should include the experience and track record of contributors”. ClfA disagrees with this and suggests that this passage is replaced with “based on an assessment of the contributors’ competence, most easily assessed through their level of professional accreditation”.

7. Suggested amendments

- 7.1. In addition to these comments, we have made a number of suggested minor amendments to the draft and attach a document with track changes with this letter. These suggested amendments are not intended to be exhaustive, but are rather to be read alongside the more substantive comments in this letter.

Chartered Institute for Archaeologists
31 January 2017