Archaeology and Planning in Greater London

A Charter for the Greater London Archaeology Advisory Service
THE PURPOSE OF THE CHARTER

This Charter sets out how English Heritage will provide archaeological advice in Greater London in accordance with government policy as set out in Planning Policy Statement 5 – Planning for the Historic Environment, supported by the Historic Environment Practice Guide issued in March 2010. The charter sets out how the Greater London Archaeology Advisory Service (GLAAS) should be consulted on archaeological issues during the planning process to ensure that there is consistency across London. This Charter sets out the role of GLAAS and how it can work with the boroughs and other partners to sustain and manage the archaeological interest of London’s historic environment for future generations.

The Greater London Archaeology Advisory Service is part of the London Region of English Heritage. It provides expert archaeological advice to local authorities, developers, owners of sites and the wider public. GLAAS can support local planning authorities at every stage of the planning process and can offer advice on:

• archaeological interest and the plan-making process,
• understanding the significance of heritage assets,
• the setting of consistent standards for archaeological work, and
• how knowledge and understanding from archaeological finds and discoveries can be made publicly available.

GLAAS is also responsible for maintaining the Greater London Historic Environment Record (GLHER). This is an important resource which should be used to inform policy development for the historic environment and support its management through the planning process.

THE SIGNIFICANCE OF THE ARCHAEOLOGY OF LONDON

Archaeological remains constitute a unique and vital source of information about the communities who have lived in the London area during the last 400,000 years. A rich variety of archaeological sites, ranging from traces of the earliest hunter-gatherers right up to the monuments of London’s recent industrial past, survive within the modern metropolis. These sites:

• contain irreplaceable information about our past,
• contribute to our sense of place, and
• are valuable assets for education, leisure, and tourism.

Some are designated as heritage assets but many more have yet to be discovered and reveal further insights into the rich history of the capital. Once destroyed, by accident or design, these assets cannot be replaced.

SCHEDULED MONUMENTS

English Heritage London Region has an Inspector of Ancient Monuments and a Historic Environment Field Advisor to advise on the management of London’s Scheduled Monuments.

Any works that might affect a Scheduled Monument, or its setting, will require Scheduled Monument Consent from the Secretary of State, in addition to any planning permission that may be required. Application should be made to the Inspector of Ancient Monuments.

There is some financial support available for owners, including programmes run by Natural England. English Heritage can provide assistance on the management and repair of heritage assets where they are at risk. Our Regional Team and Historic Environment Field Adviser can give owners advice on local schemes and general management issues.
ARCHAEOLOGY AND PPS 5

Planning Policy Statement 5 Planning for the Historic Environment sets out the importance of the historic environment and how it should be managed. The historic environment is defined as all aspects of the environment resulting from the interaction between people and places through time. Where elements of the historic environment hold significance they are called heritage assets. Heritage assets can be a building, site, place, area or landscape that is positively identified as having a degree of significance meriting consideration in planning decisions. Significance is the sum of heritage values which includes archaeological value. This may be found in all types of asset.

Effective management of the historic environment requires understanding of significance, whether the site in question is designated or not.

PPS 5 (para. 7) requires that heritage assets are conserved in a manner appropriate to their significance and that:

- there should be a presumption in favour of the conservation of designated heritage assets [HE9.1];
- there are many heritage assets with archaeological interest that are not currently designated but are demonstrably of equivalent significance and should be considered subject to the same planning policies [HE9.6];
- where the loss of whole or part of a heritage asset is justified, the local planning authority should require the developer to record and advance the understanding of what is to be altered or lost [HE12.3].

PLAN-MAKING

PPS 5 (HE2 and HE3) stresses the need for sufficient evidence about the historic environment to inform the plan-making process, so that local development frameworks set out a positive, proactive strategy for the conservation and enjoyment of the historic environment in their area, by taking into account the variations in type and distribution of heritage assets and their contribution to the local character and sense of place.

The Greater London Historic Environment Record can help provide a useful resource in which to identify heritage assets in London and understand the contribution of the historic environment including its archaeology to the character of a place.

In addition the GLHER can help predict the likelihood of discovering unidentified assets. Archaeological priority areas can be used to define areas with particular potential for archaeological discoveries, based on current knowledge. This information is also useful when identifying the impacts of development plans upon the historic environment as part of drafting Strategic Environmental Appraisals/Sustainability Appraisals.

MANAGING ARCHAEOLOGICAL INTEREST IN THE PLANNING PROCESS

ARCHAEOLOGICAL INTEREST

‘An interest in carrying out an expert investigation at some point in the future into the evidence a heritage asset may hold of past human activity. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places and of the people and cultures that made them. These heritage assets are part of a record of the past that begins with the traces of early humans and continues to be created and destroyed’

[PPS 5 Annexe 2]

The English Heritage Charter

There are established procedures for consulting English Heritage on certain applications that affect designated historic assets (including Scheduled Ancient Monuments, Listed Buildings, Registered Parks and Gardens, Protected Views, Registered Battlefields, Wrecks and Conservation Areas).

These can be found in Circulars 01/01; 01/2006. English Heritage has produced a Planning and Development Charter to enable efficient and informed consultation which can be found on the HELM website: www.helm.org.uk/server/show/nav.19675
Undesignated archaeological assets

Many of the principles in that charter are applicable to the management of undesignated sites, including buildings, where there is also potential for archaeological interest. The key to successful management is ensuring that any proposals are supported by appropriate information, and that understanding potential archaeological significance is used to inform proposals at the right stage of the process.

The PPS Planning Practice Guide (paras 58-66) advises that:

• local planning authorities identify any undesignated or local heritage assets during the pre-application stage, or
• assist applicants in identifying such assets at the earliest opportunity.

To do this the local planning authority should encourage potential applicants to seek advice on the archaeological interest in any site, including standing buildings, parks and gardens, landscape features and buried remains, from the GLAAS including relevant entries on the GLHER.

When considering proposals and their potential impact on the archaeological interest of heritage assets (PPS 5 Policy HE 6.1) a local planning authority should have access to expert advice as necessary. The GLAAS should be consulted on any development sites that meet the criteria below, whether at pre-application or application stage.

It is essential that adequate information is submitted prior to any decision being made, usually as an archaeological desk based assessment, within the design and access statement when this is required.

That assessment may identify the need for more detailed on-site evaluation to define the nature, extent and significance of any anticipated archaeological interest, before an informed planning decision can be made.

A further mitigation strategy, either to minimise impact through design, or to implement a written scheme of investigation to record and understand the archaeological interest before it is destroyed by development, can then be secured by planning condition.

Planning Conditions to Secure Recording

In some cases a pre-determination evaluation is not feasible or appropriate, in which case both evaluation and the subsequent mitigation strategy must be secured either by one staged planning condition or several individual conditions.

The GLAAS can provide advice to ensure that:

• the wording of conditions is appropriate to manage the archaeological interest;
• a suitable written scheme of investigation is submitted, and
• the written scheme of investigation be approved for implementation.

GLAAS also provides advice on best standards for
• on-site investigation,
• community engagement,
• post-investigation analysis,
• publication of results that further our understanding,
• archiving of the information produced.

Through our standards and guidance papers available at www.english-heritage.org.uk/glaas
> GLAAS Publications > Guidance Papers
RECOMMENDED WORDING
PROGRAMME OF INVESTIGATION

A) No demolition/development shall take place/commence until a programme of archaeological work including a Written Scheme of Investigation has been submitted to and approved by the local planning authority in writing. The scheme shall include an assessment of significance and research questions; and:

1. The programme and methodology of site investigation and recording.
2. The programme for post investigation assessment.
3. Provision to be made for analysis of the site investigation and recording.
4. Provision to be made for publication and dissemination of the analysis and records of the site investigation.
5. Provision to be made for archive deposition of the analysis and records of the site investigation.
6. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.

B) No demolition/development shall take place other than in accordance with the Written Scheme of Investigation approved under condition (A).

C) The development shall not be occupied until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under condition (A).

This generic condition is intended to cover investigation of all asset types, including buildings, parks and gardens, landscapes and buried archaeology. It may be adapted for specific site circumstances.

Additional conditions may be used, in particular to reserve foundation design details, which may be necessary to ensure conservation of archaeological remains in situ; or for fencing parts of sites to protect them from construction activities.

HELPING US TO HELP YOU:
CRITERIA FOR CONSULTATION

These criteria should be used by local planning authorities, or planning applicants, as a guide to identify which sites should be referred to GLAAS for archaeological advice at pre application stage; which sites should have archaeological statements to validate them at application; and which sites require expert advice before and after determination of an application:

• a site in an archaeological priority area (defined in UDP/LDF) where proposed works could affect archaeological remains below ground level,
• all sites on or near a Scheduled Ancient Monument,
• all sites of 0.4 hectares or larger not in a priority area,
• all applications for a scoping opinion for an Environmental Impact Assessment, supported by an EIA, or Environmental Statement,
• all applications where supported by an archaeological desk-based assessment as part of a design and access statement,
• all submissions to discharge archaeological or recording conditions,
• appeals.

Documentation

To enable us to respond efficiently all consultations (with the exception of appeals) must be supported by full documentation, including:

• site location plan,
• plans and elevations of existing and proposed structures,
• any supporting environmental statement,
• design and access statement and historic environment assessment if separate,
• geotechnical investigations, where undertaken,
• any historic building survey.
Historic Environment Advice and Local Authority Processes

STAGE 1: PRE-APPLICATION

Pre-application advice on the potential of the historic environment and the likely impact of the development

Appraisal of significance and potential value of the historic environment

STAGE 2: DETERMINING THE APPLICATION

No impact on the historic environment

Consideration of impact

Permission refused

Appeal

Permission granted with conditions attached to protect historic environment

STAGE 3: IMPLEMENTATION OF CONDITIONS

Approve mitigation strategy — evaluation, preservation in situ, building recording, excavation

Monitor fieldwork

Completed

More required

Approve reports, including publication

Archive deposition

Conditions satisfied

STAGE 4: COMPLETION

STANDARDS & GUIDANCE

The GLAAS Standards Papers set out standards that should be applied across Greater London, to ensure consistency of archaeological practice and inter-site comparisons.

The Institute for Archaeologists set Standards for the profession, and maintain a Register of Archaeological Organisations

www.archaeologists.net

English Heritage provide Guidance papers on a wide range of historic environment practice, which can be found on the HELM website www.helm.org.uk
GLAAS WILL ADVISE:

- whether the archaeological interest of the asset(s) has been properly identified;
- on potential mitigation to conserve the potential archaeological interest; and
- on proportionate measures to record any loss of archaeological interest through the written scheme of investigation, where appropriate.

When planning permission has been granted with archaeological or recording conditions attached, GLAAS should be notified to monitor and advise on the subsequent discharge of those conditions.

Where an application is refused because of potential harm to archaeological interest on the basis of expert advice, the planning authority should notify GLAAS to consider whether further support is required.

GLAAS will also discuss any aspects of our advice directly with the applicants, their agents or their appointed archaeological organisations. However any formal advice will always be addressed to the local planning authority.

THE GREATER LONDON HISTORIC ENVIRONMENT RECORD

The Greater London HER (formerly the Greater London Sites and Monuments Record) manages the most complete computerised database of designated and non-designated historic assets (sites of archaeological and historic importance) within Greater London.

The database, one of the largest in the country, contains over 72,000 records from the earliest human occupation of the area that is now Greater London through to the Cold War. The GLHER also includes information on references and supporting material, some of which is held by the GLHER. This includes a small reference library, copies of historic maps, journal articles, a copy of the original archaeological card index for Greater London and 6,800 archaeological and building records reports linked to the GLHER database.

Consulting the GLHER

The main role of the Greater London HER is to provide information on the known historic environment in order to inform decision making in the planning process, but also to enhance understanding of the historic environment of Greater London generally.

For those wishing to visit the record personally there is a public access desk available with a computer holding the GLHER database and associated Geographic Information System (GIS). An appointment must be made in advance in order to ensure staff are available to show visitors how to locate information and use the GLHER database.

For those unable to visit the record personally, GLHER information can be telephoned, emailed or posted. Generally this information includes:

- an html file or PDF of GLHER records,
- details of any designated assets and,
- a map of the search area.

Additionally the GLHER can be viewed via the Historic Environment portal: the Heritage Gateway (from Spring 2011). Please note that this is not a full version of GLHER database and is only updated periodically. As such it is not intended, for commercial and planning work, to be a substitute to a GLHER consultation; only to initially indicate the potential importance and significance of Greater London historic assets.

To request a search please email: glher@english-heritage.org.uk

Tel: 020 7973 3731; 020 7973 3779

London Boroughs – GLHER Access

The recently published PPS5, and its supporting guidance, sets out major changes to the planning system; highlighting the important role HERs can play in informing decision making and policy, and that local planning authorities should either maintain or have access to an HER. In addition, as a minimum, planning applicants should consult the relevant HER as part of their application.

To ensure that the London boroughs have a sound evidence base to inform decision making and policy the GLHER will:

- seek to develop stronger links with the London boroughs, and
- identify ways of supplying GLHER data in a format that can be used with borough planning systems, and
- establish regular data exchange.

To improve applicants, their consultants, and other GLHER users access to historic environment information, and the range of information available the GLHER will:

- identify data held by London boroughs, particularly local lists, which would enhance the GLHER, and with the London boroughs investigate how to access this data,
- establish regular data exchange between the London boroughs and the GLHER, and
- ensure that GLHER information on the Heritage Gateway is updated no less that four times a year.
FURTHER READING

CLG PPS 5 Planning for the Historic Environment 2010

CLG EH DCMS
Historic Environment Planning Practice Guide March 2010

GLAAS Website: www.english-heritage.org.uk/glaas

If you require an accessible version of this document (for instance in audio, Braille or large print) please contact our Customer Services Department on 0870 333 1181 or email customers@english-heritage.org.uk