

**Respondent number: 2767**



## **Examination of the London Plan**

### **Matter 45: Conserving and Enhancing the Historic Environment**

#### **Association of Local Government Archaeological Officers**

#### **Hearing Statement**

**8th January 2019**

The Association of Local Government Archaeological Officers (ALGAO) is the national body representing local government archaeology services at County, District, Metropolitan, Unitary and National Park authority level. ALGAO's London committee comprises the Greater London Archaeological Advisory Service (GLAAS) at Historic England and the local authority archaeologists at the City of London and Southwark.

# Association of Local Government Archaeological Officers

## Hearing Statement

### Introduction

1.1 This statement addresses the Inspector's questions with regards to Matter 45: Conserving and Enhancing the Historic Environment (policy HC1) of the Plan which will be discussed in week 6 of the Hearings Programme (Friday 8 March 2019). This Statement has been prepared with reference to the Minor Suggested Changes to the draft London Plan (published 13<sup>th</sup> August 2018).

1.2 This hearing statement should be read alongside ALGAO's representations (28<sup>th</sup> February 2019) on the Publication Draft London Plan made in the context of the requirements of the National Planning Policy Framework in relation to the historic environment as a component of sustainable development. ALGAO's representations were based upon and referred to a joint archaeology sector paper.. "Full Review of the London Plan: Archaeology Topic Paper Delivering Better, Faster & Focused Public Benefits" dated March 2017

<https://historicengland.org.uk/content/docs/get-involved/london-plan-archaeology-topic-paper-delivering-public-benefits-pdf/>

### **Inspector's Questions: Conserving and Enhancing the Historic Environment**

**M45. Would Policy HC1 provide an effective and justified approach to conserving and enhancing the historic environment? In particular:**

**a) Would Policy HC1 provide an effective and justified strategic framework for the preparation of local plans and neighbourhood plans in relation to the historic environment?**

**b) Would it provide sufficient detail to guide London boroughs in developing evidence that demonstrates a clear understanding of London's historic environment?**

**c) Would the approach to development management be effective, justified and consistent with national policy in relation to designated and non-designated heritage assets?**

- 2.1 We support policy HC1 and specifically the provisions for managing non-designated archaeological interest which would otherwise lack protection. There are only 166 scheduled monuments in Greater London. We estimate that over 99% of locations of potential archaeological interest are not recognised by designation. Policy HC1 provides for a consistent, evidence-based strategic framework for managing archaeological interest across the capital. It provides a locally appropriate mechanism for complying with the NPPF and the European Convention on the Protection of Archaeological Heritage 1992.
- 2.2 Policy HC1 D is necessary for delivering sustainable development because it makes specific provision for the identification of assets of archaeological interest as buried assets may not be so readily recognised and understood as those above-ground. It also makes clear that developers should seek to minimise harm through design and mitigation and importantly to conform with the NPPF that some non-designated assets should be given equivalent weight in decision-making to designated assets. Paragraphs 7.1.9 – 11 explain how this policy would be implemented, particularly with reference to the definition of Archaeological Priority Areas (APAs) in Local Plans and addresses NPPF paragraph 169 by predicting the likelihood of currently unidentified heritage assets being discovered across London. **The supporting map (fig 7.5) should be updated to show recent progress on reviewing London APAs.**
- 2.3 We welcome explicit reference to the Greater London Historic Environment Record (paragraph 7.1.4) which is an expectation of NPPF paragraph 169 and vital to the evidence and understanding referred to in HC1 Parts A and B. It is still sometimes perceived as a purely archaeological record but in fact it holds information on all types of heritage assets. We wish to draw attention to our present collaboration with the Getty Conservation Institute to create a new IT platform that will make GLHER information easily available for use by local planning authorities and developers and suggest a minor addition to 7.1.4 to reflect this... **“Historic England is working with the Getty Conservation Institute to make the GLHER more easily accessible.”**
- 2.4 We are pleased to see that the Minor Modifications published on 13<sup>th</sup> August 2018 introduce a commitment to a London-wide Heritage Strategy to be developed together with Historic England and other partners. ALGAO and other archaeological organisations will wish to contribute to this strategy to recognise the social value of archaeological heritage to local communities and the role it has to play in place-making. We hope that the Panel will accept the minor suggested change to paragraph 7.1.1.

- 2.5 We emphasise that archaeological heritage can contribute positively to the capital's future – for example through the beneficial re-use of heritage assets in urban renewal as at the Curtain Shoreditch and the London Mithraeum or through public education and engagement as seen on Crossrail and the 'Roman Dead' Museum of London in Docklands exhibition triggered by a discovery at Harper Road, Southwark. For clarity, explicit reference to archaeology in paragraph 7.1.6 would be appreciated by inserting; "In some areas, this might be achieved by.. **revealing and displaying archaeological remains**".
- 2.4 We request that paragraph 7.1.7 be clarified to explain that significance is not always visible and can reside in the hidden physical form of heritage assets – especially buried archaeological remains but also hidden elements of buildings: "An archaeological interest in discovering more about the past can exist in many different forms including buried and visible remains, standing buildings and landscapes."

## **Conclusion**

- 3.1 In summary ALGAO supports policy HC1 and hopes that the amendments outlined within the Minor Suggested Changes, particularly those referring to a Heritage Strategy, are accepted by the Panel. We believe this policy is essential to meet soundness tests of consistency with national policy and effectively and positively planning to meet the challenge of sustainably managing the nationally and internationally significant archaeological heritage of this world city. The consistent London-wide approach to these matters provides an example of joint-working across local authority boundaries.
- 3.2 We have suggested a few additional minor amendments to the supporting text to better reflect recent initiatives and archaeology's contribution to wider planning purposes of place-shaping and social value.
- 3.3 We will supply an updated version of fig 7.5 showing progress on the Archaeological Priority Area Review Programme.