

**ARCHAEOLOGY AND THE PLANNING PROCESS:  
WHAT LOCAL SOCIETIES AND CBA (LONDON) MEMBERS CAN DO**

The planning system in England recognises the importance of archaeology. The statutory framework permits local authorities, in certain circumstances, to limit development or to require the recording of archaeological material before development can take place. This is set out in the National Planning Policy Framework (NPPF), in the London Plan (Policy 7.8) and Borough Local Plans. There is much that local societies can do to support the Local Authority (LA) in setting archaeological conditions, or to ensure proposals don't fall through the planning net. This document does not deal with the built environment.

*General*

Deadlines in the planning process are short, and the process is complex. Background work will make it easier to intervene effectively:-

- Be clear about which area(s) you intend to cover, and if possible, make this known on your website. If there are other societies nearby, it may be worth checking what monitoring they already undertake, to avoid overlap and share the load; if you find yourself operating in an area where another Society has an interest, it would be courteous to let them know;
- Local Groups have an invaluable advocacy role with local councillors. You can find out who the local member is, who is the cabinet member for planning or environment, and the council's heritage champion. You could invite them to your events and lobby them about concerns.

Check the local authority (LA) plan on the LA's website. This should include **Archaeological Priority Areas (APA)**; sometimes called by other terms such as **Areas of Archaeological Significance**. A development proposal in an APA should automatically be referred for archaeological advice as part of the planning process. If the plan doesn't include APAs and you think it should, lobby the planning department to address this in future. The plan may also list scheduled monuments which are protected by law under the 1979 Ancient Monuments and Archaeological areas act. Applications for Scheduled Monument Consent are handled by the English Heritage Inspector of Ancient Monuments, who may also intervene if there is perceived to be an impact upon the setting of a Scheduled Ancient Monument. Details of Scheduled Ancient Monuments can be found on the National Heritage List for England <http://www.english-heritage.org.uk/professional/protection/process/national-heritage-list-for-england/>.

- Become familiar with the Greater London Historic Environment Register (GLHER) for your area. GLHER is the new name for the old Sites and Monument Record (SMR). Contact them either by email [glher@english-heritage.org.uk](mailto:glher@english-heritage.org.uk) or ring 02079733731. Their web site is <http://www.english-heritage.org.uk/professional/advice/our-planning-role/greater-london-archaeology-advisory-service/sites-and-monuments-record/>. If it does not contain sites which you think it should, get them included!
- LA planners have access to specialist archaeological advice. Southwark and the City Corporation employ their own archaeologists. Other LAs use English Heritage's **Greater London Archaeological Advisory Service (GLAAS)**. The expectation is that the LA will

obtain and follow this professional advice. However, sometimes planning officers fail to do this, so local societies can play a valuable role.

- The useful **GLAAS Charter** (attached) explains how archaeology should be treated in the planning process, and GLAAS' role. It's also worth looking at other material referred to (PPS5, guidance notes etc).
- Find out from which GLAAS advisor covers your LA area(s) (or the contact details for the archaeological advisor in LB Southwark or the City).  
<http://www.english-heritage.org.uk/professional/advice/our-planning-role/greater-london-archaeology-advisory-service/glaas-staff/>
- GLAAS advisors have a heavy workload and cover wide geographical areas. It may be worth introducing your society to the relevant advisor, and asking how you can best support them with effective input. Keep e-mails brief and always include key references (eg. site name/address, planning application reference numbers) so they can be easily tracked.

#### *Monitoring Planning Applications*

- **Monitor the lists of planning applications regularly** - if possible at least fortnightly. Look at the LA's website to see how their planning process works. The LA is required to make applications available for public comment; they will be listed on the LA website, and some LAs will e-mail application lists to specified contacts. Look particularly for applications which fall within the APA or in other sensitive areas you have identified. There is a particular exception with respect to church developments where formal planning may not be required. If you become aware of any such developments that may have archaeological implications, alert GLAAS.
- If an application is listed in an area which you regard as potentially sensitive, look up the full application details - you can then eliminate those that are minimally invasive.
- If the application appears invasive, and you consider there is a strong likelihood that valuable archaeological evidence might be present which could be lost, then:
  - **Check the deadline** for comments (this will be short, and must be met!)
  - **Consider alerting the relevant GLAAS advisor** to the application. GLAAS should be consulted automatically on larger applications or those in APAs but this does not always happen, so a quick e-mail may be helpful. Give the planning reference number, explain the nature of the site - eg is it within the LA's APA;
  - **Send formal comments** to the LA - a short, focused letter explaining why the site warrants archaeological assessment (and potentially, conditions to ensure valuable archaeological information isn't lost); if appropriate, remind them that the area is within the APA (most applicants will not be aware their property lies within an APA and will not mention this on their application; the planning officer may not be aware either); ask them to seek GLAAS advice. It is usually possible to send your formal letter as an e-mail attachment or you may sometimes be able to comment on the LA website. Copy your comments to the GLAAS advisor. Consider whether there are other public benefits you would like to secure - a talk or

educational visit, an interpretation board or on larger projects a public viewing area or the retention of some historic fabric. But remember there are limits on what is considered reasonable and some developers will be more responsive than others.

- If the proposal is not within an APA (or if the LA plan does not have these), you will need to make a fuller initial case to both GLAAS and the LA about why archaeological assessment is needed. Keep your main letter short, put supporting information in an annex: eg references to published reports of nearby sites, or to surveys of the area which indicate important archaeological evidence might be present;
- Look out for any response from GLAAS; if you are worried that the application may have been overlooked, consider a polite reminder. The GLAAS advisor should send formal advice direct to the LA; s/he will often send you a copy of this advice, but not necessarily. GLAAS advice must be compliant with policy, reasonable, proportionate and evidence-based. For smaller-scale developments advisors will only identify highly sensitive locations for further consideration.
- If relevant, consider alerting other amenity groups/Civic Societies to the significance of the development, and your comments, and encourage them to comment within the deadline. It is always useful for the LA to know that local people want the archaeology investigated.

#### *Further Steps in the Planning Process*

- **Monitor the next steps on the LA website.** For straightforward applications, a final decision may be given quickly by the planning officer; check that the appropriate conditions have been included. If not, alert GLAAS at once. Otherwise:
  - The application may be sufficiently large and/or contentious to go to a **meeting of the Council Planning Committee** for decision. If so, consider whether to make representations to those councillors who are members of the Committee, and any councillors covering the area of the proposed development; their contact details will be on the LA website. Meetings are open to the public, and it can be worth attending to show commitment to your society's written comments - Councillors do take notice of public interest in issues. In certain circumstances it may be possible for members of the public to speak in support of comments;
  - If the planning proposal is turned down, the applicant may submit a **revised proposal**. *Earlier comments and advice will not be carried over automatically*, so if appropriate, alert GLAAS and comment again;
  - An unsuccessful applicant may **appeal to the Secretary of State**. The LA should alert GLAAS, and should include any archaeological aspects in their submission to the inspector, but may omit this - particularly if the appeal is not about the archaeology, but about, say, traffic issues. GLAAS should comment directly to the Inspector to ensure archaeological conditions are included in his final, binding decision. Ensure you register your own comments directly with the Inspector (eg by enclosing your initial letter to the LA), within the deadline;

- If you think the Inspector has omitted something important, take this up immediately as there is only a very limited time for changes to the formal documentation.
- Archaeological work costs money. If you have commented on an application, and conditions have been set, the developer may ask whether your society will undertake the work involved. Be aware that archaeological work for planning purposes must be approved by the LA and should be carried out by professionally qualified archaeologists. It is possible for local societies to undertake this type of work if they can meet the required standard; consult GLAAS about this - but be aware that there may be legal and insurance implications from carrying out planning-linked work, so check what is involved. For further information see: GLAAS and Institute for Archaeology standards.
- Occasionally developers 'jump the gun' and start works on site without complying with all planning requirements. If you suspect this is a risk keep a discreet watch on the site and advise GLAAS and the LPA if works start without an archaeological presence. Do not confront the developers yourself. However, visiting a site and talking to the workmen can often prove fruitful.