



Fig. 1: the possible remains of the Hope Theatre on Bankside, SE1 (Sarah Gibson)

## Learning from ten years of PPG16

Peter Pickering

This was the title of the conference SCOLA organised on 20th March 2002 in conjunction with the Royal Town Planning Institute. It was intended primarily for people in the planning departments of London Boroughs. Nearly sixty people came – some from as far afield as Lincolnshire and Jersey. It proved very timely in relation to the current revision of the Planning Policy Guidance Notes 15 (Planning and the Historic Environment) and 16 (Archaeology and Planning). This article highlights some of the main themes and the more important of the many stimulating things that were said.<sup>1</sup>

The proceedings were opened by Sally Hamwee, the Chair of the Greater London Assembly. She was very encouraging and supportive of archaeology and the heritage of London generally. ‘Planning,’ she said, ‘which ensures we

deal sensitively with finite resources of archaeological remains, is not a brake on development, but a part of sustainable development.’ She criticised the Government’s apparent concentration on increasing the speed of the planning process, and her hearers came away confident that what influence she has on the Mayor’s Plan for London, on his forthcoming Cultural Strategy and on the Boroughs’ UDPs, will be exercised in a helpful manner.

### How far has PPG16 achieved its objectives, and are they the right objectives?

Sarah Gibson said that PPG16 was a highly effective tool in planning and managing the archaeological resource, giving a vital role to the

local planning authority. She used the Hope Theatre site (Fig. 1) to illustrate how well PPG16 could work.

Jon Finney used two sites near Heathrow to illustrate deficiencies. English Heritage had advised that one of the sites was merely of regional importance, while Hillingdon Council and the developer had been able to agree that it was of national importance; in the other the consultant to a mineral company insisted that his client must know up front what costs he might incur on archaeological works, refused to accept the standard PPG16 condition (looking for a Section 106 agreement tied to a fixed financial sum); and actually argued that the PPG16 condition was unenforceable.

In the view of Sophie Jackson, PPG16 had established a useful framework for dealing with archaeology on development projects, but had not delivered an environment to foster good archaeological practice; PPG16 encouraged a reactive site by site approach to archaeology whereby planners and planning archaeologists assessed the direct and immediate impact of the scheme on an area defined by the development rather than considering the importance of the site within the wider archaeological landscape over the longer term. Competitive tendering and proliferation of archaeological units had led to a fragmentation of archaeological knowledge, and the transfer of decision-making to people with relatively little expertise.

Rob Whytehead was worried that smaller developers were less likely than larger ones to consult GLAAS at an early stage on the archaeological potential of a site, and that, despite the Greater London SMR and local studies libraries, prospective developers often did not have detailed plans and other data such as soils reports on their sites. Although pre-determination assessment enabled an appropriate and reasonable planning decision to be made, reduced the chances of unexpected discoveries, and benefited the applicant by ensuring that he could quantify time and cost in advance, many applicants attempted to put off early evaluation, and then hoped that they could start work as soon as evaluation finished.

Andy Lawson said that PPG16 had been vital to the development of archaeology in Britain;

previously archaeologists had become involved once decisions had been made and then said 'You can't go ahead with the development, we need to investigate the site', causing delay and extra costs, while they sought Government funding. Nobody – archaeologists, developers, English Heritage, or planners, had been popular. PPG16 placed the decision-making over the heritage in the planning process, making those who wanted to develop sites containing archaeology responsible for their own actions.

John Samuels believed that overall the system worked well and was forcing archaeology to develop as a proper profession. 'If you go to any European conferences to meet archaeologists, our system is their envy. We used to look to other countries as having far stronger legislation rather than guidance, but a disadvantage of legislation (according to French and German archaeologists) can be that if there is a change of Government attitude then everything can be drawn back and may not get implemented in the same way.'

Dave Batchelor said that the long survival of PPG16 in a rapidly changing environment was a testament to its original concept and drafting. But the debate had moved on and issues such as sustainability, environmental impact assessment and Local Agenda 21 had perhaps overtaken some of what had been covered by PPG16.

Hedley Swain feared that though PPG16 had brought money into archaeology to provide a system that worked for planners and developers, that system did not easily communicate archaeology to those people who wanted to know about it; it was geared to the planning application and the excavation, while the products, the archaeological archives, were not valued.

## Evaluation

Rob Whytehead emphasised the importance of obtaining as much information as possible on the archaeology of a site with potential prior to determination; a failure to undertake pre-determination evaluation increased the chances of unexpected discoveries. John Williams pointed out that research was essential to ensure that the best possible decisions were made at the evaluation stage, for instance, on the confidence rating of different percentages of trial trenching.

## Is there a limit to what developers can reasonably be expected to finance?

John Williams pointed out that what was required in a planning condition had to meet the planning test of reasonableness.

Rob Whytehead wondered if it was reasonable to expect developers to fund innovative or experimental techniques, though excavations should of course be to the highest standards.

William McKee said that far too much information was now required before the grant of consent; developers had no problems with the basic principle of paying for archaeological investigation, but, particularly with the growing tendency of the Government and local authorities to regard the development process as a cash cow to be milked, the cost of moving towards a development had become very great, and developers were very concerned about committing money to a scheme, just to have it refused; he believed that a lot of the archaeological work required could be followed up once consent had been granted.

## Archive curation, presentation and communication

Rob Whytehead emphasised that the archaeological report met the fundamental objective of communicating to archaeologists. But much more needed to be done to communicate to the broad public, and especially the local community, what lay around them. Means towards that end included signs on site hoardings, newspaper reports, viewing areas, open days, guided school parties and the like, though problems with site security and health and safety needed to be addressed. Many archaeological contractors and some development projects had web sites on which archaeological results can be posted. There was a need for synthetic works aimed at the popular audience to bring together what was known about London and make it relevant to local audiences. It might be reasonable to seek some sort of levy or resource allocation from each archaeological project to contribute to an overall work.

Sarah Gibson mentioned the *More London Bridge* excavation, where Southwark Council and the developer had initiated the creation of an interactive display for the foyer of the new City Hall to tell visitors, Londoners and workers in the area the archaeological story of the site.

John Williams emphasised the importance of long-term curation of the archive as part of the concept of preservation. Involvement of the public as an excavation progressed was admirable but experience had warned of difficulties. The costs of 24-hour security on the various sites along the Channel Tunnel Rail Link would pay for several major excavations – perhaps a better use of the money.

## The philosophy of conservation

Jon Finney distinguished three reasons for preserving buildings:

1. Because we are attached to them emotionally; probably because they are old or of particular historic interest. Tampering with the fabric of such a building diminishes it and eventually destroys its significance.
2. Because they are beautiful – great works of art or architecture. They can be restored and repaired as long as the design is retained.
3. Because they tell us something about our past. Such a building can be dismantled and re-assembled, and provided it is done correctly and honestly, the artefact is still preserved.

## 'Preservation' *in situ*

Concern was articulated by Rob Whytehead. Were archaeological remains preserved *in situ* really preserved – the conditions in which they were preserved might have been changed by the development scheme, say by introducing new chemicals that leached into the sub-soils. Monitoring stations could be installed so that water levels on waterlogged sites could be checked and the chemistry of the water analysed, but could this be ensured over say 5-10 year periods? How long could procedures secured by planning conditions or agreement be maintained? What if profound changes took place and threatened the archaeology? How could it be rescued by excavation and who would pay?

## **Resources in local authority planning departments**

William McKee, who had during his career been a local authority planner, had recently visited one of his old departments and found some 67 staff in it, while he had had 200. Rob Whytehead observed that competitive tendering and the number of different contractors required local authorities to undertake monitoring; while Sophie Jackson complained that planners and planning archaeologists did not have the power or resources to monitor properly the quality and value of work undertaken by archaeological contractors. Andy Lawson thought it wholly reasonable for the developer to expect to be told clearly by the local authority what he had to *do* to comply with the requirements; for this the authority must have proper resources. Jude Plouviez worried about the huge problems in local authority resourcing (not only in planning but also in museums and heritage advice services), as well as the problems due to the very variable provision of SMRs and Development Control Officers, who were key to successful archaeological projects.

### **Should PPG16 be revised?**

Most speakers thought it should. John Williams wanted PPG16 to enshrine the concept of understanding, so that in addition to preservation *in situ* and by record there would be preservation through understanding. Rob Whytehead thought that it should make clear what had to happen after excavation stopped, in particular making the results available to archaeologists and to the general public. John Samuels conceded that some elements of PPGs 15 and 16 might require change; but some of this had occurred naturally in the years since they first appeared, and any subsequent alterations and modifications would require careful consideration to ensure that what had been achieved was not lost. Sarah Gibson insisted that the strengths of PPG16 must not be weakened in any revision.

### **Should PPG15 and PPG16 be amalgamated?**

There were different views on the apparent desire of the Government to amalgamate the two PPGs.

Jon Finney was unhappy at the idea. Dave Batchelor thought that the difference in approach of the two reflected a difference in the way in which people regarded archaeology (a subject with a professional mystique) and the personal and immediate environment of their own townscapes. PPG15 had 210 paragraphs; PPG16 had 31 – PPG15 was trying to cover much more ground than PPG16. Considerable changes would be needed if there were to be one PPG for the whole historic environment, which would need a common set of standards and principles for the generation and dissemination of information gained as a result of works undertaken within the planning system; current PPG16 practices could not be taken and used in the PPG15 context without re-appraisal. PPG16 recognised the key importance of SMRs. But PPG15 did not recognise the need for a structured and comprehensive information system to underpin advice given under it. SMRs currently formed a base that could be expanded to include the built environment and so become historic environment records.

John Samuels believed that there should be a combined PPG on cultural heritage, defining importance, setting, and impact; cultural heritage must be all embracing in time and content, since all the elements of the distant or recent past contributed to it. The current separation between the two PPGs was uncomfortable with 16 about dirt archaeology (buried remains) and 15 about standing buildings, historic parks, landscapes etc. While most archaeologists recognised that all of these were really archaeological remains of one sort or another, and some planning authorities took the same view, the separation might lose the connections between them. The linkages that assisted the understanding of significance might therefore not be seen and whole aspects might be ignored despite the reference to 16 in PPG15.

### **Sites and Monuments Records (SMR)**

Barry Taylor's enthusiastic presentation included an account of the plans to make SMRs more accessible and put them on line. Sophie Jackson strongly endorsed these plans and insisted that they must be made mandatory and given more resources. Andy Lawson pointed to their need for maintenance, updating and improving and for

expertise to interpret what is in the SMR, without which the facts are meaningless.

John Samuels said that SMRs were fundamental to the successful application of cultural heritage guidance within the planning system. They varied considerably throughout England and Wales in content, quality, and availability. To set standards and perhaps make the information available through the Internet was vital to the proper implementation of the guidance and would benefit archaeologists, commercial developers etc. It could be achieved only by making the SMR a statutory obligation for each Local Planning Authority. That would cost money but was the only way to make a level playing field.

Jude Plouviez got to the heart of the matter when she pointed out that if SMRs had statutory status, local authorities looking for cuts could not go for the whole of the archaeology service because they would still have to provide something.

Dai Morgan Evans in the chair called for a show of hands and got overwhelming support for making it a statutory requirement for local authorities to have SMRs.

## Churches

Joseph Elders said that some local authorities were threatening to charge dioceses for advice given by their archaeologists or they would withdraw their officers from Diocesan Advisory Committees. The Government should issue guidance to Local Planning Authorities that the provision of archaeological advice for church bodies was a proper part of their responsibilities. Such a commitment would benefit the archaeological heritage as a whole, of which churches were a large part, and would properly

recognise the responsibilities of authorities in respect of developments of churches, parallel to their responsibilities under PPG16 generally. Some churches found difficulty in the interpretation rather than the substance of PPG16, relating to funding of archaeological work arising from smaller maintenance, reordering and extension projects; the archaeology might even cost more than the project. There ought then to be some help with funding as foreseen in paragraph 25 of PPG16; this stated that where the developer was a non-profit-making community body which was unable to raise the funds to provide an excavation and subsequent recording without undue hardship, an application for financial assistance might be made to English Heritage. Despite this provision, such assistance scarcely existed, except in a few very special cases.

## Tailpiece

I close on a lighter note with four entertaining quotes from John Samuels. 'There is nothing more boring than an empty trench.' 'I have never come across a case where someone says that whatever remains have been identified are unimportant remains.' 'It gets tedious asking archaeological firms why they are authorised to give a 25-page report saying that they found three skeletons.' 'Asked to define 'cultural heritage' the only thing I could think of very quickly was William Dugdale's comment in the 17th century that man without a sense of the past falls into a bestial sausageness. I do my best to avoid that.' I guarantee that the otherwise very accurate transcript has 'sausageness' and I am sure John Samuels would avoid that, as would most *LA* readers; but I think he may actually have said 'savageness.'

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1. The conference was held in the Lecture Theatre of the Museum of London; we are very grateful to the Museum for letting us use it. The sessions were chaired by Martin Millett (SCOLA Chairman), George Lambrick (Director of the CBA), and Dai Morgan Evans (General Secretary of the Society of Antiquaries of London). The speakers were Sarah Gibson, Senior Archaeological Officer of the London Borough of Southwark; John Williams, Kent County Archaeologist; Rob Whytehead, head of the Greater London Archaeological Advisory Service; Barry Taylor, Greater London Sites and Monuments Officer; Jon Finney, Chairman of the London Branch of the Institute of Historic Building Conservation; Dave Batchelor, Local Authorities Liaison Officer from English Heritage; William McKee, former Director General of the British Property Federation; Sophie Jackson, Senior Project Manager at MoLAS; Andy Lawson, Wessex Archaeology; John Samuels, John Samuels Archaeological Consultants; Joseph Elders, Archaeology Officer of the Council for the Care of Churches; Hedley Swain, Museum of London; and Jude Plouviez, Vice Chairman of Rescue. A transcript of the proceedings is available from the Secretary of SCOLA (the Standing Conference on London Archaeology), Pat Wilkinson, 1B Forest Drive East, London E11 1JX.