

# Commentary

by Gromaticus

## Good-bye PPG, hello PPS

The Housing and Planning Minister, John Healey, has announced that a new Planning Policy Statement 15: *Planning for the Historic Environment* will replace Planning Policy Guidance notes PPG 15 (Planning and the Historic Environment) and 16 (Archaeology and Planning). It will be accompanied by a Historic Environment Planning Practice Guide. The aims of the PPS are to:

- Ensure there is a focus on understanding what is significant about a building, site or landscape so that it becomes easier to determine the impact of the proposed change. It uses the 'values' approach of English Heritage's *Conservation Principles* as an underlying philosophy to inform decision-making.
- Urge councils to monitor all their historic assets. For example, local authorities will be urged to create publicly-accessible Historic Environment Records which developers will be expected to consult so that they can take into account the historic environment impacts of their applications.
- Support constructive conservation. It encourages active exploitation of the heritage as an asset rather than seeing it as a potential barrier to development.
- Introduce new clearer policies on setting and design, issues which are frequently the source of the most contentious cases involving the historic environment.
- Put the historic environment in the context of the challenge of climate change. Councils weigh carefully any loss of enhancement of the asset and its setting against the benefits of the application such as increased production of energy from low or zero-carbon sources. The greater the negative impact on the significance of the asset, the greater the benefits that will be needed to justify approval.
- Deal with all types of heritage in a single document. It brings in a new, integrated approach to the historic environment and 'heritage assets',

moving beyond the outdated distinction between buildings and archaeology.

- Place greater emphasis on pre-application planning and discussion. Councils and developers should learn about the significance of affected heritage assets before designs are drawn up – the more they understand the asset, the greater the chances of a successful application.
- Maintain the same level of protection for the historic environment as the current PPGs 15 and 16 but expresses the policy much more succinctly making it easier for councils to use (the number of pages has been cut from over 100 to around 13).
- Provide greater clarity on key topics e.g. archaeological interest, conservation areas and their preservation and enhancement, World Heritage Sites, conflicts with other planning priorities and recording.

At the same time, a new planning circular was published (see [www.english-heritage.org.uk/whcircular](http://www.english-heritage.org.uk/whcircular)), which emphasised the importance of protecting our World Heritage Sites, and reflects the same message with the need to conserve what is significant about a site and what gives it its universal value.

As might be expected, the announcement was warmly received by Minister of Culture Barbara Follett and by Simon Thurley, Chief Executive of English Heritage. The Statement can be seen at [www.communities.gov.uk/publications/planningandbuilding/consultationhistoricpps](http://www.communities.gov.uk/publications/planningandbuilding/consultationhistoricpps). The PPS will be supported by guidance prepared by English Heritage; a draft of it is on the English Heritage website at [www.english-heritage.org.uk/pps](http://www.english-heritage.org.uk/pps). Both are available for consultation until 30 October.

The archaeological community's first reaction was probably one of relief that this long-heralded change is at last in the public domain. The big question is of course how this will work out in practice, especially given the

Government's intentions to reduce delays in the planning process. How much can be read into the change from "Guidance" to "Statement": stronger or weaker? The answer seems to be that a clearer distinction is being made between policies and principles, on the one hand, and how they are implemented, on the other.

The PPS sets out the principles, which at face value are just the sort of things that one would wish to see, although I wonder how much notice local authorities will take of being urged to create HERs, especially in a time of financial stringency.

The real meat will come in English Heritage's PPS Practice Guide ([www.english-heritage.org.uk/server/show/nav.21136](http://www.english-heritage.org.uk/server/show/nav.21136)). We are assured that "Though the PPS itself will have primacy, the Practice Guide will carry governmental weight and be enforced as such. This is no different to the situation with PPGs 15 and 16, except that policy and guidance are clearly separated, making the documents easier to use and understand."

Concerns have been expressed about the extensive use of the term 'significance'; significant to whom, and how can one measure it, even relatively? It seems to me that issues of significance cannot be avoided, but I doubt if many local authorities have the necessary expertise to deal with such issues. London can rely on English Heritage's GLAAS (Greater London Archaeological Advisory Service), but many other areas may not be so fortunate.

The test will be, of course, how the new system will work in practice, not how it looks on paper. This may be one of the first major tasks for CBA London.

## Fieldwork Roundup

The Fieldwork and Publication Round-up for 2008 is being distributed with this issue. If you have not received your copy, please contact the Membership Secretary (address on p. 145). Our thanks go to Cath Maloney for collating the Fieldwork Round-up, and to Isabel Holroyd for the Publications section. Please let us know of any omissions.