

# Commentary

by Gromaticus

## Noises off

This year, I've been detecting a feeling of unease among the archaeological community. To me, it feels like standing at night in a dark wood, hearing noises from unknown creatures in the wood, and wondering what they are and whether they might be dangerous. It might be useful to stand still, listen very quietly, try to identify the creatures, and assess whether they pose any risk.

The first creature is the wild NPPF (National Planning Policy Framework), warnings of which come from all directions (I'm not alone in the wood): a joint response from the CBA (Council for British Archaeology), ClfA (Chartered Institute for Archaeologists), FAME (Federation of Archaeological Managers and Employers), and others from Historic England, the Society of Antiquaries, and probably more.

Before I try to summarise their warnings, a reminder of the background may be useful. We are all familiar with, and grateful for, the document PPG16, which in November 1990 set out the guidelines within which commercial archaeology has operated since that date. Some of us may even remember the anarchic and unpredictable era that preceded it. It was subsumed in 2012 into the broader NPPF document, which covered all aspects of planning and its impact on the environment in its widest sense. Some of this year's noises in the wood are coming from its offspring: the revisions proposed in March 2018 and put out for consultation ending on 10 May 2018.

The responses have concentrated on what was *not* said in the proposed revisions, rather than what was said, particularly on what had been left out compared to the earlier version, and on some subtle changes of emphasis. Perhaps the most serious perceived loss is that of the 'core principles section' of

the NPPF, which appeared prominently in the 2012 version, but which appears only piecemeal in later sections of the new version. In particular, the core principle – that planning should 'conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations'<sup>1</sup> – has disappeared, and the ideas that it embodies appear much later in the document.

The revisions give the impression that this is less important than was previously thought. Indeed, the whole raft of apparently minor changes could give the intended reader (ie Planning Departments and developers) the impression that archaeology, and the historic environment in general, are less important than the original document suggested. The warning voices have spelled out the dangers, and attempted to rebut them. It is clearly hard to argue against the main thrust of the proposals – the desperate need for more housing – but this can and should be achieved without sacrificing the historic (or indeed the natural) environment.

Other noises can be heard in the wood; alongside the aggressive growls are the frightened squeals of the small furry animals that we all know and love. In this context, I am referring to the HERs (Historic Environment Records), which currently play a key role in the management of development by local planning authorities, and 'without which the current system for conserving and protecting heritage assets with archaeological interest would not survive'. There is

'an apparent reduction in policy support for [HERs] and the curatorial services based on them... their policy status ("Every local planning authority should maintain a HER or have access to one" –new NPPF Glossary) is now a long way from their actual status as a key planning and information tool which can provide the "strong" or

"clear" reasons for affording protection for the historic environment'.<sup>2</sup>

Dare I imagine a 'protect your local HER' movement? Perhaps not in London, where the GLHER seems reasonably secure within Historic England, but that should not absolve us from offering support wherever else it may be needed.

All this may seem arcane and remote from day-to-day archaeology, but I believe that it is nevertheless of crucial importance. Apparently small changes in policy documents can have severe consequences, and I, for one, would not like to head backwards towards the situation pre-1990.

At the start, I mentioned other noises in the wood. One might also hear the growls of the Brexit bear, and the siren calls of the HS2; but they will have to wait for another issue.

## Erratum

We regret that, in the last issue, in V Yendell *et al* 'Liberating the once carefree wanderer', the incorrect image was used for Fig 6 (an inset from the Agas map of 1562). The image shown came from Rocque's 1746 map of 'An Exact Survey of the City's of London Westminster ye Borough of Southwark and the Country near 10 Miles Round London' (reproduced by H Margary in 1971). We apologise for any confusion this may have caused.

## London Archaeological Prize

The panel of judges have been reading through a strong shortlist this summer. All are welcome to hear the winner(s) of the Prize announced at the London Archaeological Forum, at the Museum of London on 19th November at 6pm.

## Fieldwork and Publication Round-up

The Fieldwork and Publication Round-up for 2017 is being distributed with this issue. If you have not received your copy, please contact the Membership Secretary (see page 153). Please let us know of omissions from either section.

1. Extract from the CBA, ClfA, and FAME response, itself quoting from NPPF: <https://tinyurl.com/yao9ofru>

2. Extract from the Society of Antiquaries response: <https://tinyurl.com/ydbqb6w8>