



CLASP

Community Landscape & Archaeology Survey Project

Please reply to D.F. Hayward MBE, The Secretary, Organising Committee, CLASP,
29, Winston Close, Nether Heyford, Northampton NN7 3JX davensal@hywd1.fsnet.co.uk

29th October 2009

Dear Sir

PPS Planning for the Historic Environment: Historic Environment Planning Practice Guide - Consultation Response

CLASP is a community based archaeological group based in West Northamptonshire. We are both proactive in our own right in working with the local archaeology and also act as an umbrella group for twelve other local heritage and history groups. We are a registered charity.

We have studied your draft Guidelines and are totally in support with their ethos and direction. We have concerns with the lack of mention of the community sector being involved or at least consulted in both the pre planning and later stages. We would submit that there is a distinct role for the community sector in the planning process. It must be stressed however that this must be in agreement with the commercial sector and carried out to agreed national standards.

CLASP would urge that specific mention be made of involving the community sector where appropriate throughout the guidelines. Three specific paragraphs that need consideration are as follows: -

Para 10

'Other organisations' mentioned in line three should be expanded to specifically mention 'community based archaeological and heritage groups' as they often hold unpublished local research and other information.

Para 29

In appropriate cases it is ideal to consult with local community heritage and archaeological groups who may hold relevant information to inform the pre planning discussions and therefore reduce the risk of problems at a later, formal, stage.

Para 64

Not only should members of the public be able to interpret and view projects referred to in this paragraph but where appropriate community heritage and archaeology groups should be able to work in partnership with commercial archaeologists.

Attached to this letter is our response to the DCMS Consultation paper on a new Planning Policy Statement 15. Hopefully this will assist you in making consistency with the DCMS with your final documents.

It may be of value if you visit our website: - www.claspweb.org.uk
and note the significant contributions that CLASP has made to the current major planning applications in West Northamptonshire. These include submissions to the Planning Appeal that is considering major developments in Daventry. Each of these submissions has now resulted in Statements of Common Ground being reached with the developers and permitted a united front to the Appeal. We consider that this approach should be a standard for all community groups and should therefore be supported in the proposed PPS 15 and in your Guidelines.

We are in agreement and support the submission by the CBA.

If you wish to discuss this with us in greater detail do not hesitate to contact the writer at the above address.

Yours sincerely

D.F. Hayward
Secretary
Organising Committee

Executive Committee: Alan Watson (Chair), Ruth Downie (Secretary), Angela Evans (Treasurer), Stephen Young (Archaeology Director), Nick Adams, Jeremy Calderwood, Sandra Deacon, Tony Kesten
Organising Committee: Jeremy Cooper (Acting Chair), Dave Hayward (Secretary), Julia Johns (Membership Secretary)

CLASP is grateful for support from:



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29th October 2009

Dear Sir

Planning for the Historic Environment **Consultation Response**

CLASP, a community archaeological group based in West Northamptonshire is pleased to respond to your consultation. We are both a proactive group generating our own work and act as an umbrella organisation for twelve heritage and history groups in the area. We are a registered charity.

Having studied your draft document we have raised several points that it is considered need resolving to ensure the community is properly represented in the future protection of the heritage and archaeology of the country. These points are attached to this letter as a separate document.

With regard to the specific questions that you request answers we have answered these as far as possible where we feel qualified. Again these are on an attached paper.

To illustrate the work that CLASP has done with responding to the planning process in West Northamptonshire you are urged to visit our website www.claspweb.org.uk where details of our submissions to date are shown. As a result of us being consulted with at an early stage we have been able to reach Statements of Common Ground with the developers at Daventry for three major proposals there that are currently subject of a planning appeal.

If you wish to contact to discuss any of these points in greater depth do not hesitate to contact the writer at the above address.

Yours sincerely

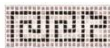
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Specific Observations

Page 9, Para 1.1

Last line. After word "..... recreation." Suggest a new sentence, "Where totally new communities are being developed by the creation of new towns and villages and also the expansion of existing towns into large new areas, proper investigation of the heritage of the area can help to create a sense of community in the new area; this is particularly so when the community can be involved in the process of discovering the existing heritage prior to, during and after the development process."

Page 11, Para 1.12

We would totally agree and support that both the HER should be effective and with the availability of expert support to planning authorities. It is important though that both of these are properly funded and supported by the appropriate local authority. In the case of the expert support it is also important that this is clearly identifiable and accessible not only to the planning authority but also to developers and community groups.

Page 18, Para HE 1.1

This needs to reflect that the HER must be regularly updated and be easily accessible, ideally externally by electronic means, for planners, developers, community groups and researchers.

Page 18, Para HE 1

There needs to be some mention here of the need to consult widely when drawing up Plans not only with statutory bodies but also the wider community in the form of community heritage and archaeological groups. These groups are becoming increasingly relevant with their knowledge of local heritage and should not be ignored.

Page 19, Para HE 3

Again there is a need here to mention the need for consultation on a proactive basis with community groups as outlined above.

Page 19, Para HE 3.1

To encapsulate the entire process the following words need inserting in line 2 before the word "...conservation" Suggest it should read, "..... strategy for *identification, interpretation and conservation,*".

Page 21, Para HE 7

It is important that even in this early stage of the planning process that consultation takes place not only between the developer and planning authority but also with the local community. Again in all probability community groups will have extensive up to date knowledge of heritage, including archaeological issues. To consult at this stage in

the planning process can prevent significant problems at a later, more formal stage.

Page 22, para HE8.2

We welcome the comment here about consultation with the local community.

Page 22 & 23 Para HE 9

Subject to the caveats below we would welcome the thrust of this paragraph.

Page 22, paras HE9.2 and 9.3

Whilst we welcome the comments regarding community consultation there is perhaps a need in the latter paragraph to widen the consultation by the local planning authority beyond just where the evidence suggests that there may be an archaeological etc. significance to the local community. The local community may well know something that is not known to the local planners. Whilst it would be difficult to consult in detail on every application there does need to be a balance created between the two.

Page 25, para HE 10.6

We welcome this policy but as it stands there is concern that it would be open to subjective assessment and personal interpretation. In the last sentence who makes the decision that a non designated asset is of equal significance to a scheduled monument? It is noted in footnote 14 that this should be a County Archaeologist but currently not all counties have these. Also who would identify these assets at local or regional level? A county archaeologist may not always be aware that a planning proposal may be in existence. Further consideration is required here.

Page 26, para HE 13

It would be ideal if an inclusion could be made in this paragraph to reflect the value in appropriate cases of involving the local community through community heritage and archaeological groups in this investigatory and recording process. This is of real significance with larger developments where there is a need to create a sense of community identity.

Annex 1 Terminology

Include: -

Community

This may include not only statutory bodies and individuals but also voluntary groups and charities that have an interest in the area by involving their members in researching, investigating, interpreting and conserving their local heritage.

Response to Consultation Questions

1. Whilst the document is obviously untested we would say probably yes.
2. We have a vested interest in the archaeological assets but would hope that there is a proper balance.
3. No comment
4. None that CLASP is aware of at this stage.
5. See our comments re Page 25, Policy HE 10.6
6. No comment
7. No comment
8. No comment
9. See our comments re Policies HE 8 & 9
10. Hopefully yes but increased commercial pressures must be resisted that may emanate from population growth and the subsequent need for housing and other infrastructure.
11. There may be an increased cost in local authorities areas that do not currently maintain an efficient HER nor employ an appropriately graded archaeologist.
12. No comment