

THE ARCHAEOLOGY FORUM

a grouping of independent bodies concerned with archaeology

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27 April 2009

Dear Sir,

DRAFT PLANNING POLICY STATEMENT: ECO-TOWNS - CONSULTATION

The Archaeology Forum is a grouping of the key, non-governmental organisations concerned with archaeology in the UK. Its members include the Association of Local Government Archaeological Officers UK, the Council for British Archaeology, the Institute of Conservation, the Institute for Archaeologists, the National Trust, the National Trust for Scotland, Rescue, the Society of Antiquaries of London, the Society of Antiquaries of Scotland, the Federation of Archaeological Managers and Employers, and the Society of Museum Archaeologists UK.

The Archaeology Forum is pleased to have the opportunity to contribute to this consultation by CLG on the Draft PPS for Eco-towns and would like to make the following comments.

General points

The Sustainability Appraisal suggested that the PPS should have a separate section on landscape and the historic environment:

a section could be included in the Draft PPS on the 'landscape and the historic environment'. This could focus on procedures – for example, requiring proponents to undertake a landscape character assessment and a characterisation of the historic environment – and outcomes – ensuring that development is sympathetic to the landscape and conserves and enhances heritage assets.

However, the draft PPS (26.) states that provision for these issues is set out in existing national planning policy on the historic environment, delivered at regional and local level through RSS and LDFs, and that these matters can be considered to be of “regional and local significance only, which will be handled at the appropriate level of plan-making”.

The Archaeology Forum does not share this view and supports the recommendation in the Sustainability Appraisal. Master-planning should be informed by an understanding of the historic character and heritage assets of the Eco-town location. There may be impacts or other considerations in relation to nationally significant heritage assets which should be taken into account. Decision-making on development affecting nationally important heritage assets (for example, on scheduled ancient monuments) does not take place only at the regional or local level. We urge that specific reference should be made to consideration of the historic environment in the draft PPS, cross-referring to the existing PPGs 15 and 16 (and forthcoming PPS for the historic environment).

The Draft PPS emphasises that Eco-towns must achieve sustainability standards significantly above the equivalent levels of development in existing towns and cities and should demonstrate best practice in terms of sustainable development. The planning of eco-towns should therefore go beyond the standards already in place in considering how enhancement of the historic environment can help furnish the future identity of a new community.

The Consultation Questions

Q2: Are the locational principles for Eco-towns sufficiently clear and workable?

The Forum welcomes an approach based on clear principles and standards. In 3.2, in the list of planning policy statements with which all eco-towns should comply with, we believe that that policies for the historic environment should be specifically included.

Eco-towns should reflect the historic character of the places where they are being developed as stated in the Locational Principles (3.): ‘Eco-towns should develop unique characteristics by responding to the opportunities and challenges of their location and community aspirations’. The principles would be considerably improved by a reference to the value of the unique character provided by the historic environment and the need for an understanding of this to inform the design of development.

Eco-town standards

Q 4.1 Do you consider the standards provide a clear basis on which to make decisions on planning applications for Eco-towns?

The Forum welcomes the suite of standards as a clear basis for proceeding. We suggest that the section on Green infrastructure (4.18-4.19) be strengthened to include a requirement that applications should demonstrate a range of types of green space reflecting the local landscape character and should include protection of historic environment assets in their multi-functionality.

We trust these comments will be of help. Thank you for providing the Archaeology Forum with this opportunity to contribute to the consultation on the Draft PPS.

Yours faithfully,

A handwritten signature in black ink that reads "Gill Chitty". The signature is written in a cursive style with a large, sweeping flourish at the end of the name.

Dr Gill Chitty

Council for British Archaeology,
Secretary, The Archaeology Forum

The Archaeology Forum's members are:

The Association of Local Government Archaeological Officers UK
The Council for British Archaeology
The Institute of Conservation
The Institute for Archaeologists
The National Trust
The National Trust for Scotland

Rescue: the British Archaeological Trust
The Society of Antiquaries of London
The Society of Antiquaries of Scotland
The Federation of Archaeological Managers and Employers
The Society of Museum Archaeologists UK