by: Representation No
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LDP Document: 62 Archaeology SPG

RefPoint: 62.

5466   Brecknock and Radnorshire Committee of the Camp

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5466.P50		01/03/2020	☐	E	C	W	M		Summary: Comments on Archaeology SPG

Document:Archaeology SPG

Question	Representation Texts
Question:	**Details**

Representation Text: .   BRB-CPRW thanks PCC for the opportunity to comment.   We warmly welcome this SPG which is thorough, authoritative and clearly written. It will also act as a public guide to many important but little-known online resources. It demonstrates the rich quality and sheer quantity of our Powys archaeological heritage and underlines the importance of Offa's Dyke.

It should be required reading for all planning officers, architects/agents, relevant landowners and everyone applying for planning permission for a major development or one close to a Scheduled Monument.

An introductory definition of "archaeology" and how this is separated out from "historic environment" for the purposes of this SPG would be useful.

Sadly, the length of the SPG will deter many readers. We would encourage the production of a short, accessible document - no longer than 2 pages - that could be routinely sent to anyone considering a smaller development not involving a scheduled monument or listed building, especially those in the historic core of a settlement.

There are, of course, factors beyond the planning system that affect archaeology and we wonder if they have a similarly good level of protection?   In particular, agriculture. There should be similar protection of archaeology from, for example, deep ploughing, flooding or draining, uprooting of ancient hedgerows, felling of historically significant trees etc.

Perhaps PCC could collaborate with CPAT etc. to produce a ground-breaking, 2-page comprehensive "Quick Guide to protecting Archaeological sites".

We wonder whether Wat's Dyke deserved a mention alongside Offa's Dyke.

How could the SPG be improved?

Definition
A definition of "archaeology" and how this is separated out from "historic environment" for the purposes of these 2 SPGs would be useful and might be used to inform some minor culling.

The questions in Fig 2:

"Is the site a listed building or within the curtilage of a listed building?
Does the site include a building that may be of local historic interest?"

and the text of 6.20 sentence 1,
require a clear explanation of why they are relevant to archaeology before the reader gets to Fig 3.

Because there is so much information, any that is not directly relevant should be removed: for instance, 4.4 on searching house history.

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Length

Any opportunity to reduce this should be seized, including by avoiding repetition and pruning and restructuring sentences to remove redundant words. Examples are given below.

Structure and clarity

Since the SPG is densely packed, a clear structure for easy reference is all important.
At present there is a problem with the structure of headings. The index showing purple chapter headings and black italic subheadings but purple sub-subheadings (looking like chapter headings) reappear in Ch 4 from 4.27 onwards. Both black sub-headings (listed in the index) and purple sub-subheadings are unrelated to the paragraph numbering. This is specially confusing because the index gives purple precedence over black.

We appreciate that structure is often revised in a final SPG draft but recommend that a full index is included and the paragraph numbering and headings are designed to reflect the hierarchical structure of the contents and inclusion of lists.

Acronyms such as WFS and WMS at 4.46 should be spelt out.

Sections 5 & 6 on Local Planning Policy and implementation
This nub of the SPG, is less clear, concise and coherent than the preceding 4 sections.

Suggested format for policy:

Brief description of LDP: objectives, strategic policies, DM policies, further information in appendices then each policy in turn reproduced before the discussion.

any comments about scope and relevance of policy (for each policy).

6.1 & 6.2 Sentence 1 simply repeat policy in Section 5 but 6.2 Sentence 2 is important - especially the "early stage".

If 6.1 and 6.2 s1 are to be retained:
6.1 Sentence 1: "need to be": replace by either "must be" or "should be".
    Sentence 2 does not make sense.

6.3 Sentence 2: suggest: "Development proposals should have regard to the advice about key stages and demonstrate the step approach taken to comply with planning policy"

6.4 to 6.32. There is much essential and useful information here but it should be made more concise.

7 Planning Process

Important information but could be more concise.

Examples:
Suggest delete 7.1 sentence 1 and, Sentence 2 say "Advice in Section 6 ensures archaeology has been……"

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Delete 7.4 Already said in 7.1.

7.5 suggest "If further information is required to allow proper consideration of the application, the LPA will make an information request proportionate to the likely impact on archaeology. The LPA may require additional desk or field assessment or mitigation proposals, as set out in Section 6, and will insist on these prior to determination" (half the word number).

Fig 6. Bottom left box should read "application to discharge condition refused". We believe the applicant has the right to try again.

The appendices are useful.

Typos:
Two small typos noticed:
4.10 end of line 3 'monument' should be 'monuments'
4.39 line 2 '(or provides access to)' should be '(or provide access to)'

Council Response: Support is noted.

Recommended to include a definition of archaeology taken from TAN 24 within the introduction of the SPG. Also, to clarify that archaeology is part of the historic environment and not separate to it.

The final SPG will be accompanied by a summary setting out the key messages of the SPG, which will also help to navigate the full SPG. CPAT already has a short guide entitled 'Archaeology and your planning application'. No changes recommended.

The SPG provides guidance in respect of development that requires planning permission, and therefore it is not appropriate for it to cover other works that do not require planning permission. Various agricultural activities do not fall within the planning remit. There are separate policies and processes in place for hedgerow removal and removal of protected trees or trees within a Conservation Area. No changes recommended.

Further guidance on looking after scheduled monuments and different types of archaeological sites can be found on the Cadw website. No changes recommended.

Offa's Dyke has been referred to in the SPG given its significance within the Powys LDP area, and following on from reference to it in the reasoned justification to LDP policy SP7. CPAT has confirmed that Wat's Dyke does not enter Powys at all as it is last visible in Oswestry and terminates near Maesbury, Shropshire. No changes recommended.

For clarity, it is recommended that additional text is included in para. 6.6, which explains the historic value of these buildings and potential for significant archaeology associated with them.

Para. 4.44 which refers to RCAHMW guidance is considered to be relevant as a source of information. No changes recommended.

The Council has been through all the specific comments and made changes to the SPG to improve readability where in agreement. It is anticipated that users will not always read the document from cover to cover but will refer to specific pages or tables, hence the need for repetition within the document. The summary that is planned to go alongside the SPG will help to identify the key messages for readers.

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6395   **Canal and River Trust**

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
6395.P5		28/02/2020	☐	E	C	W	M		Summary: No comment

Document:Archaeology SPG

Question	*Representation Texts*
Question:	**Details**
Representation Text:	. We have no comments to make on the Archaeology SPG.
Council Response:	Noted no comments.

by: Representation No

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6812   McDonnell, Gerry

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
6812.P1		23/02/2020	☐		C	W	M		Summary: Comments on Archaeology SPG

Document:Archaeology SPG

Question	Representation Texts
Question:	**Details**

Representation Text: .   2.1 Purpose of the Guidance Although clearly the focus of the guidelines is for the planning process, surely a more holistic approach should be included, in particular the link between archaeology heritage and tourism and archaeology, heritage and health (e.g walks linking archaeological sites). This suggest that the planning policy is in silos.

4.17 "There is also the potential for other unknown buried archaeological remains that have yet to be formally identified that could be discovered in the course of undertaking development." There are bound to be more archaeological sites replace "potential for" with certainty of. Repeat in 4.37

4.52 – 4.57 local societies, Newtown Welshpool Town have active policies Presteigne does not

6.9 "If the response is 'no' to all of these questions, it is unlikely that further archaeological assessment work will be required." This illogical, many 'developments will encounter some past human activity, to imply that the previous record provides the answer is untenable.   This will result in circular arguments, i.e. is there is nothing in the HER then there is no archaeology. The UK HER's are often poor in recording early industrial sites, e.g. early iron working slag heaps. This repeats in 7.5

7.15 States that sites will be excavated, but does that include post-excavation analysis and publication. There is no point in excavation unless it is taken through to full publication.

7.25 "a final report will need to be produced and submitted to the LPA"   This requires more specificity, regarding post-excavation analysis, final report including detailed postexcavation analysis as laid down in the programme or scheme of works etc.

7.30 "By following the approach set out above, this should avoid or, at least, reduce the risk of discovering unexpected archaeology during development of a site." No it won't!, because the whole process it is predicated on there being previous archaeological finds, registered in the HER. For example, a search of the Archwilio database for 'slag' in Powys returned 61 hits.   The logic of this proposal would argue that there were only 61 occurrence of iron working in Powys since the Iron Age. As an internationally respected researcher of archaeometallurgy, specialising in iron, I find that very hard to believe!!

7.30 "If the archaeological remains are considered to be of national importance" Come on, who are you fooling. It's very hard, nigh on impossible to identify a site as of national importance at this stage. Also, what happens to those sites (99%) that are found unexpectedly and not of National Importance.   What happens to the small developer, e.g. a house extension that encounters unexpected archaeological deposits, who won't have the resources to fund an excavation/post excavation etc.

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8 Process Charts Figure 5 If the first box that's states "Does the site have archaeological potential or are there potential impacts on other archaeological sites?" If the answer is no, then no archaeological intervention can take place, unless when the ground is disturbed archaeological deposits are encountered, AND ADMITTED TO, then the archaeology is lost. This first box with the answer no is guaranteed to fail archaeology.   Again, if the answer to Box 2 (Have significant archaeological remains been identified?) is no the archaeology is lots. Also, what is meant by significant? To many archaeologists iron smithing slag is not significant, but to me and most cases it can be very significant, e.g. it relates to the economic basis of a site. In conclusion it appears that the whole process is reliant upon entries in the HER, which as the example of ironworking slag record is incomplete.

Council Response: Reference is made in the introduction to the SPG at para. 1.3 to the benefits of the historic environment to tourism and well-being. It would not be appropriate to provide further guidance on these matters in this planning document, which focuses on interpretation of local planning policies. No changes recommended.

The use of the word "potential" is considered to be appropriate in this context and reflects national guidance, which refers to "known" and "potential" archaeological remains. No changes

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recommended.

The SPG recognises the work undertaken by organisations at a local level in relation to the historic environment. No changes recommended.

Requests for further archaeological assessment as part of a planning application need to be supported by evidence that indicates the potential for archaeology, which may include records on the HER. Cadw and CPAT will provide advice to Officers on information requirements relating to archaeology, as per para. 7.6. Unexpected archaeology may still be found in the course of development and the SPG explains the arrangements in these circumstances at para. 7.30. No changes recommended.

For larger pieces of work like excavation and evaluations, or indeed any intrusive works that recover artefacts and samples, an approved Written Scheme of Investigation would include the requirements for post excavation analysis. As explained in para. 7.25, the final report will need to be submitted to the LPA and a copy, together with a digital copy of any archive produced, is also provided to CPAT for inclusion on the Historic Environment Record. This means that this information will be publicly available. No changes recommended.

The need for post excavation analysis will depend on the nature of the work and on what is agreed as part of the Written Scheme of Investigation. No changes recommended.

Recommend to amend para. 7.30 to clarify that unexpected archaeology may continue to be found during the development of a site.

Para. 7.30 reflects the guidance in TAN 24 in relation to unexpected archaeological discoveries, which provides guidance on what would happen if the archaeological discoveries where of national importance. Where sites are not nationally important, the site would normally be completely excavated if it cannot be preserved in situ by a late change in design and layout of the development. Recommend additional para. after 7.30 to explain this.

If there is no known or potential for archaeology or potential impacts on archaeology, it is not possible to require archaeological intervention through the planning process. Planning requests must be reasonably related to the proposal. The planning process is also informed by the expertise and knowledge of CPAT and Cadw who advise Officers on archaeological matters and on the significance of archaeology. No changes recommended.