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### **Evidence to the Public Bill Committee: Localism Bill**

1. The Federation of Archaeological Managers and Employers represents over 50 archaeological practices throughout the UK, including commercial consultancies, universities, local authorities and charitable trusts.
2. Together, our members employ around 2,000 specialist staff engaged in the recording, analysis and publication of archaeological evidence revealed by development in England, Scotland and Wales.
3. Our members work in close partnership with local planning authorities, public utilities and developers to deliver government planning policy on the historic environment, and to ensure that it contributes directly to local distinctiveness, place-shaping and sustainable development. We therefore welcome the government's objective of engaging and empowering local communities, and its potential benefits for the management and understanding of the historic environment.
4. We do, however, have concerns about the potential impact of some measures in the bill on the present system of managing the historic environment in the development planning process. Around 95% of the nation's heritage assets have no statutory designation, and depend instead for their protection upon the policies set out in Planning Policy Statement 5: *Planning for the Historic Environment*, allied to an effective national network of local authority archaeological and historic environment services.
5. We are concerned that any proposed reform of the development planning system must enshrine the policies and principles set out in Planning Policy 5. We note in Part 4 Chapter 3 (Community Right to Challenge) the duty on local authorities to consider expressions of interest by a relevant body, such as a voluntary or community group, charitable trust or parish council, in providing a non-statutory service on behalf of the authority, and the requirement for this to be followed by an appropriate procurement exercise.

6. We can envisage that this process might in some cases apply to the archaeological and historic environment services currently provided by local authorities, and we welcome the duty on local authorities to consider whether acceptance of such an expression of interest would promote or improve the social, economic or environmental wellbeing of the authority's area.
7. However, where the transfer or outsourcing of such a service is being considered, we strongly believe that its scope and standard must be very clearly specified through the procurement process, to ensure that there is no future deterioration in its quality or threat to its long-term sustainability.
8. To ensure that such specification is fit for purpose, we urge government, or its historic environment advisors English Heritage, to issue early guidance to local authorities on the expected scope and minimum standard of such historic environment services, however they are provided.
9. We welcome the requirement under Part 4 Chapter 4 (Assets of Community Value) for local authorities to maintain and publish a list of assets of community value and to provide a moratorium on their disposal to enable their purchase by the local community. This will potentially provide an additional safeguard for both nationally designated and locally important non-designated heritage assets.
10. We note the proposed amendments to the Community Infrastructure Levy under Part 5 Chapter 2, and urge the government to include within its definition of 'infrastructure' community resource centres in which the local historic environment can be displayed, studied and enjoyed.
11. With respect to the proposals on Neighbourhood Planning in Part 5 Chapter 3, we have serious concerns that qualifying bodies may not have access to the necessary specialist advice on the historic environment, such as that currently provided by local authority historic environment services and by English Heritage. We regard access to such advice as essential, both to assess the archaeological impact of Neighbourhood Development Orders, and to formulate local policies in Neighbourhood Development Plans which take account of strategic policies to safeguard the historic environment set out in the Local Development Framework.
12. We note the in Part 4 Chapter 6 the proposal to abolish the Infrastructure Planning Commission and transfer its functions to the Secretary of State, and seek reassurance from government that this will lead to no reduction in the level of protection and care afforded to the historic environment under the present system.