



London Committee

Greater London Authority
City Hall
The Queen's Walk
London
SE1 2AA

9 December 2016

Dear Sir/Madam,

A City for All Londoners

Thank you for the opportunity to comment on this vision document for London. I am responding on behalf of those members of the London Committee of the Association of Local Government Archaeological Officers: England that represent Greater London and the London Borough of Southwark.

The Association of Local Government Archaeological Officers (ALGAO) is the national body representing local government archaeology services at County, District, Metropolitan, Unitary and National Park authority level. These provide advice to nearly all the District, Unitary and other local government bodies in the country.

ALGAO: England co-ordinates the views of its member authorities (92 in total) and presents them to government and to other national organisations. It also acts as an advisor to the Local Government Association (LGA) on archaeological matters. The range of interests of our members embraces all aspects of the historic environment, including archaeology, buildings and the historic landscape, and our stated aims are to:

- Provide a strong voice for local authority historic environment services and promote these to strengthen and develop their role within local government in delivering local and national government policy
- Ensure local government historic environment services are included within policy (national and local) for culture and education
- Ensure that policy aims to improve the sustainable management of the historic environment

- Promote the development of high standards in the historic environment profession

Greater London is unlike the rest of England because Historic England provides the capital's Historic Environment Record, and also archaeological advice to the GLA and borough councils other than the City of London and Southwark who employ their own archaeologists. ALGAO's London committee covers the whole of Greater London including the City and Southwark.

General comments

London is one of the premier world cities and as such we recognise that it both faces major challenges and presents huge opportunities across a wide range of policy areas. We welcome the document's positive statements on London's heritage and wish to emphasise that London's great time-depth is part of what makes it stand apart from most of today's other great world cities: this is worthy of recognition in a vision for London's future.

London was founded almost two thousand years ago and has been England's leading urban centre for most of the intervening period. From the Middle Ages it has been the capital city of a major European nation and in the 18th century London became the largest metropolis in the world, the hub of a world-wide trade network and empire. The dynamism, diversity and internationalism of modern London has deep roots which are reflected in and supported by its physical fabric. As a consequence, London has one of the greatest urban time-depths of the world's leading modern cities; its internationally significant archaeological resource reflects that legacy.

The National Planning Policy Framework (NPPF) makes it a core principle that heritage assets should be conserved in a manner appropriate to their significance and that conservation and enhancement of the historic environment is a Local Plan strategic priority which should be supported by a clear strategy.

Managing London's archaeology for public benefit needs a workable planning policy and implementation framework because archaeology is a finite irreplaceable resource and most archaeology is not protected by other legal means. Archaeology in London can provide dramatic new discoveries which on occasion reach an international audience building the city's 'brand'. But this is only part of the story, because there is so much development needed we also need policies which allow us to combine the old with the new through innovative design, place-shaping and a role in community, culture and even the creative industries.

Getting the right policies into the new London Plan is essential to achieving this outcome. We are therefore working with colleagues in our sector to submit an Archaeology Topic Paper providing evidence of the public benefits arising from supporting archaeology in London and how securing those benefits depends upon adequate policy provision being made in the London Plan and Borough Local Plans. The paper considers what policy framework and related delivery mechanisms need to be maintained and how they could be improved to provide more efficient processes and better outcomes for London and Londoners. It will

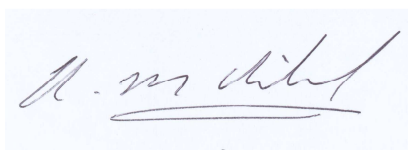
place these recommendations within their national and international legal context, including the potential implications of new or future changes to national planning regulations which could place archaeology at risk.

The specific issues which we have currently identified for the new London Plan are to:

1. Maintain existing policy for managing heritage assets of archaeological interest, emphasising securing public benefits and engaging local communities.
2. Properly recognize the role of the Greater London Historic Environment Record as a key information source and the desirability of making it more accessible, comprehensive in its coverage and better used.
3. Include explicit reference to Archaeological Priority Areas and their use in plan-making and decision-taking, including recognizing undesignated sites of national importance.
4. Provide appropriate safeguards in relation to the allocation of sites for 'permission in principle' where there is a significant risk to archaeological interest.
5. Better recognize the archaeological and historical interest relevant in policies for open spaces, geology, trees and woodlands and water bodies.
6. Recognize that archaeological investigations should be undertaken by suitably qualified individuals or organisations in order to advance understanding and better reveal significance. Explain that this includes analysis and publication of results and that in some cases better results can be obtained by a common brief or working arrangement across several sites in an area.
7. Support a consistent London-wide approach to strategic characterisation drawing upon established best practice outside London and integrated into the Greater London Historic Environment Record.
8. Recognize the importance of maintaining the Museum of London Archaeological Archive as part of the city's critical cultural infrastructure necessary for sustainable development.

We look forward to contributing to the new London Plan.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'S. Kidd', with a horizontal line underneath.

Mr Sandy Kidd MA MCIfA MRTPI FSA

Secretary ALGAO London Committee

Principal Archaeology Adviser

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A handwritten signature in black ink, appearing to read 'Gillian King'. The signature is written in a cursive style. Above the signature, the word 'electronic' is printed in a small, light grey font, repeated three times. Below the signature, the word 'electronic' is printed in a small, light grey font, repeated three times.

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