ALGAO Cymru: Is-Grwp Cynllunio / Planning Sub Group Meeting

Wednesday 5th February 2019 - 10:30-14:15

Clwyd Powys Archaeological Trust, Welshpool

Meeting Minutes

Attendance:

CPAT – Mark Walters DAT – Mike Ings, Zoe Bevans Rice GAPS – Ashley Batten (chair), Jenny Emmett (minutes) GGAT – Rob Dunning SNPA – Tomos Jones BBNPA – Alice Thorne Cadw – Neil Maylan (by telephone)

The order of the agenda was adjusted to accommodate NM's availability.

I. Apologies

Judith Doyle, Cloe Gerrard

ACTION: AB to contact Cy Griffiths, CBA

2. Minutes of previous meeting

All approved

Actions from previous meeting:

- **I.** Securing historic building recording (see item 3.1)
- 2. DAT have circulated template spreadsheet for statistical recording.
- 3. NM circulated CIRIA streetworks document.
- 4. AB supplied case studies.
- 5. DMRB and Streetworks (see item 9)
- 6. University liaison (see item 3.2)
- 7. Procedure for accessioning of reports (see item 3.3)
- 8. AB delivered paper at CBA conference.

3. Matters Arising

 <u>Historic building recording</u> – AT reported difficulties in securing historic building recording (particularly of unlisted buildings) following structural change within the Authority. Contributing factors are a lack of understanding from BBNP planning staff that archaeology includes historic buildings, a lack of specific policy reference at local and national level, and an outdated local list of historic buildings that is biased towards settlements.

ZBR noted that Pembrokeshire has a good SPG for locally listed buildings and AT confirmed she has found this useful.

MW noted the benefits of regarding historic building recording as a form of predetermination evaluation, particularly to inform prospective listing. The group agreed this is a useful tool where limited information is provided with an application.

The group reported consistent practice in the requirement for professional historic building recording. However CPAT no longer use applicants' photo record conditions as a result of having received records of considerably varying quality. A Level I record is specified instead.

ACTION: JE to circulate GAPS guidance for applicants' photo records.

ACTION: RD and GAPS to send example planner training presentations to AT

ACTION: ALL to share case studies to demonstrate archaeological historic building recording as standard requirement and to share any examples of enforcement cases.

ACTION: AT to investigate attendance at SWCOF.

This topic was discussed further with NM when he joined the meeting. Notes of the discussion are included here for convenience.

AB summarised the previous discussion for NM. NM noted that the model conditions set out in the relevant Welsh Office circular include a condition for historic building recording.

ACTION: RD to send link to AT.

NM suggested referring to the General Permitted Development Order that defines 'a site' as anything recorded on the SMR (now HER), which can include recently identified historic buildings. NM also noted the merits of seeking pre-determination information.

JE queried whether the LDP has a historic landscape character policy, as can be cited to include vernacular architecture. AT reiterated that the LDP is out of date, and advice/enforcement is reliant upon interpretation.

NM noted that Cadw have been considering training provision for local authorities about archaeology in the planning process but that this is not imminent.

2. University liaison – AB reported lack of dialogue and reporting in relation to Cadw-funded university research project at Bryn Celli Ddu, specifically the lack of a project design or prior notification of fieldwork to curators, and resistance to sharing information with curators prior to publication. This is a particular problem given the potentially lengthy delay before publication occurs and the ongoing threat to the archaeology in question in the interim. AB has raised this with ALGAO UK and found that this is a nationwide issue. GAT have been obliged to consider the use of the HER data agreement as an enforcement tool to secure deposition of data, as the agreement permits use of HER data only for a fixed period and requires the deposition of new data as a condition of data provision.

MW reported a similar lack of communication and feedback to the HER. The group noted that this also applies to some community and other non-university projects.

AT is developing guidance for archaeological research within BBNP in relation to their status as a major landowner. This forms part of a broader environmental project but is hoped to encourage future research in BBNP including the reporting of the results.

TJ noted that SNPA were trying to build links with Bangor University and had a long-standing relationship with Sheffield University.

ACTION: AB to report situation to ALGAO Cymru to highlight the implications for heritage management.

- 3. <u>Accessioning of ES chapters and Heritage Impact Statements</u> There has been no change in practice regarding deposition of ES chapters with the HERs. CPAT and GGAT HERs do not appear to be accepting Heritage Impact Statements, but GAT and DAT HERs are.
- 4. <u>Membership and personnel</u> The group discussed whether to invite the Pembrokeshire Coast NPA archaeologist and BBNPA planning manager as observers to the next meeting.

4. ALGAO Matters

AB provided an overview of the context, structure, administration and membership of ALGAO at UK and Wales levels. He explained the relationship of the current group to both ALGAO UK and ALGAO Cymru. Consideration needs to be given to the future format of these meetings and to succession planning, including who will succeed AB as Chair of ALGAO Cymru following his move to Cadw.

JE will be succeeding AB as GAT representative for ALGAO Cymru. John G Roberts is expected to resume attendance as SNPA member at the next ALGAO Cymru Planning meeting.

ACTION: ALL to discuss membership/representatives internally.

ACTION: AB to seek expressions of interest from possible new Chairs of ALGAO Cymru.

ACTION: ALL to consider and submit items eligible for ALGAO funding to the new Chair.

ACTION: ALL to review the terms of reference and constitution circulated by AB and feed back to AB ahead of next ALGAO Cymru meeting.

5. HER Guidelines implementation

The group have experienced few problems with the new guidelines, these mostly having occurred around the time of their release. Bilingual report summaries are usually included, but there is more variation in summaries for new PRNs. It is possible that these may be being supplied direct to the HER rather than being included in reports. It was noted that some HER officers prefer to produce their own summaries due to the variable standard of those provided in reports.

RD suggested inclusion of a proforma/checklist for compliance with standards; the

group agreed this could be useful.

NM joined the meeting by telephone.

6. Utilities

TJ reported possible scheduled monument damage case at Druid's Circle, Penmaenmawr, whereby an electricity pylon appeared to have been constructed within the scheduled area with no evidence of SMC having been obtained.

ACTION: NM to follow up within Cadw.

CPAT and GAPS noted absence of progress in liaison with SPEN following meeting in c.2015. NM confirmed Cadw have no contact with the electricity providers other than as a statutory consultee.

7. Cadw guidance

Cadw are considering running training days in conjunction with ClfA for historic environment professionals, covering setting, and the new/draft guidance for Scheduled Monument Consent.

NM drew attention to changes to the text of Planning Policy Wales in the 10th edition, specifically para. 6.1.24, which no longer provides for protection of the setting of nationally important remains. It was noted however that other sections of the document and TAN24 continue to refer to the setting of all assets.

8. Planning statistics

NM requested statistics for Q1-Q3 of the current financial year and requested to be informed of any problems.

ACTION: ALL WATs to send statistics to NM.

9. Streetworks and Archaeology document/ CIRIA Good Practice Guide

The CIRIA Good Practice Guide has been published online.

No progress has been made to date with the streetworks document due to staff illness, but it is hoped to resume work on this in c. 12 months' time. The topic is also being considered by ALGAO UK, but the group agreed a Wales specific document was desirable.

NM left the meeting.

10. Standards in commercial work

AB reported a trend for the replacement of manual recording (i.e. site drawings and publication photographs) with GPS and photogrammetry, which appears to be widespread amongst a range of contractors. The group expressed surprise and concern, noting that the problem may be exacerbated by the itinerant nature of (particularly early career) archaeological contract work and by off-site processing of data by different staff.

JE noted that geophysical firms rarely received the results of subsequent excavation and were therefore unable to review their original interpretations. The group reported similar experiences of varying quality of surveys and agreed that follow-up dialogue would be beneficial.

RD enquired about the existence of published guidance for auger sampling, in relation to a pre-application evaluation of peat deposits. There appears to be no specific publication but MW has a couple of relevant documents.

ACTION: MW to forward sampling guidance.

II. AOB

 Pre-application consultation – JE asked the group whether they are consulted consistently at pre-application stage, as this varies between GAT's LPAs. DAT and GGAT are receiving many consultations, mostly directly from developers or their agents and consultants. It is not always clear (for the purpose of distinguishing potential funding streams, with reference to the Simpson review) whether these are part of a formal pre-application process, or informal discussions at pre-application stage.

ACTION: AB to discuss status of Simpson review with NM and ALGAO Cymru.

- <u>Coflein</u> MI sought the group's views on the use of Coflein in reports. All
 responded that it is not permitted, in accordance with the Ts&Cs of usage. The
 inappropriate use of Archwilio was noted to be a more widespread problem. JE
 reported that GAT now require inclusion of an HER enquiry reference number in
 reports to demonstrate that a formal enquiry has been made.
- Local Development Plans JE enquired whether the group had any experience of LPAs commissioning archaeological assessment/evaluation to de-risk candidate sites for LDPs. There were no instances of work being carried out on a third party's land. However RD reported that Monmouthshire CC had carried out a full staged programme of work on their own allocated land prior to sale for development.
- 4. <u>Marine Licences</u> The number of marine licence consultations received was found to vary across Wales, with GAT receiving approximately 2 per week, while DAT, CPAT and GGAT receive less frequent enquiries, though often in batches, with a tendency to be for relatively minor works. AB suggested that the WATs might usefully arrange training with marine licence staff at NRW.
- **12.** Date and location of next meeting: CPAT, date tbc.

LIST OF ACTIONS

ltem		Initials
I	Contact Cy Griffiths	AB
3.1	Circulate GAPS guidance for applicants' photo records	JE
	Send example planner training presentations to AT	RD, JE, AB
	Share case studies of archaeological historic building recording and any examples of enforcement cases	All
	Investigate attendance at SWCOF	AT
	Send info about model conditions to AT	RD

3.2	Report situation re university communications to ALGAO Cymru	AB
4	Discuss ALGAO membership	All
	Seek expressions of interest in chairing ALGAO Cymru	AB
	Consider and submit items eligible for ALGAO funding to the new Chair	All
	Review the ALGAO terms of reference and constitution circulated by AB and feed back to AB	All
6	Cadw to investigate possible monument damage	NM
8	WATs to send planning statistics to NM	All except TJ and AT
10	Circulate auger sampling guidance	MW
11.1	Establish status of Simpson review and discuss with Cadw and ALGAO	AB