

## **A Charter for the Greater London Archaeological Advisory Service (GLAAS)**

This Charter sets out how Historic England will provide archaeological advice and the Historic Environment Record for Greater London.

The GLAAS Charter explains how we handle requests for pre-application advice and how GLAAS should be consulted on planning applications; it covers our advice on matters of policy and management of the archaeological resource; and it explains how we maintain the Greater London Historic Environment Record and work in partnerships with others.

### **Our commitment**

We are committed to continuously improving the quality and timeliness of our service.

GLAAS provides pre-application advice and currently gives 95% of planning application advice to local authorities within 21 days. The GLHER provides information to 99% customers within its target time-scales, normally 7 days.

We are committed to providing constructive advice at all times and aim to provide clear responses in a timely manner in our role as archaeological adviser to the London boroughs. We monitor our turnaround performance and hold regular reviews of cases to ensure consistency in our approach and clarity in our responses.

This Charter forms our Code of Practice and we will periodically update it in response to our evolving role within the planning system.

### **National Expertise, Locally Delivered**

Historic England advice is based on our experience and expertise in the historic environment. We provide our advice through teams in our nine Local Offices covering Development Management, Heritage at Risk and Historic Places.

In London, we also maintain the Historic Environment Record and provide local authority archaeological advice equivalent to the services provided by local government archaeological officers outside the capital (except for the City of London and the London Borough of Southwark, which have their own in-house archaeology advisers). GLAAS advisers can when necessary draw upon our network of staff across England with a wide range of professional skills.

We prioritise our efforts according to identified archaeological potential and significance, respond to changing demands and align our services with the growth priorities of local authorities and communities engaged in securing sustainable development.



Historic England

If you wish to contact us about GLAAS advice, or consider we have not followed our own published procedures, please contact Historic England's London Office: [london@HistoricEngland.org.uk](mailto:london@HistoricEngland.org.uk).

### **Freedom of Information**

We are subject to the Freedom of Information Act 2000 and the Environmental Information Regulations 2004 which provide a general right of access to information we hold or for which we are responsible.

We may provide the information you have supplied in response to a request made under this legislation, subject to any exemptions which apply. We will consult with external parties as necessary prior to releasing information.

### **Equality Implications**

Public bodies are responsible for ensuring that their plans, policies and activities do not unfairly discriminate against a group protected by equalities legislation.

It is the responsibility of the public bodies that we advise to ensure that they have paid due regard to local equality implications when implementing our advice.

## 1. The Role of Our Archaeological Service in London

Historic England is government's expert adviser on England's heritage. Since 1990 we have provided an archaeological advisory service for Greater London.

GLAAS is responsible for the Greater London Historic Environment Record (GLHER). This is a key resource which should be used to inform policy development for the historic environment and support its management. Using the GLHER, GLAAS provides expert archaeological advice to the Greater London Authority, local authorities, developers, owners of sites and the wider public. GLAAS supports local planning authorities at every stage of the planning process by offering advice on:

- archaeological interest and the plan-making process,
- assessing and managing the significance of undesignated heritage assets of archaeological interest in decision-making,
- defining and securing appropriate and proportionate requirements for archaeological mitigation (including archaeological investigations), and
- how to advance understanding of London's archaeological heritage and make this knowledge publicly accessible.

We encourage groups to consider their local heritage in neighbourhood planning and can also offer advice to landowners, community groups and individuals on the conservation, management and interpretation of archaeological remains outside of the planning system.

More information on GLAAS can be found on our [website](#).

### The basis of GLAAS advice

Our advice is shaped by legislation and based upon government policy and guidance. It is underpinned by Historic England's Conservation Principles and the Chartered Institute for Archaeologists' Standard and Guidance for archaeological advice by historic environment services.

'Constructive Conservation' expresses the role we play in promoting a positive and collaborative approach to conservation that focuses on actively managing change. The aim is to accommodate the changes necessary to ensure the continued use and enjoyment of heritage assets while recognising and reinforcing their significance. Our advice seeks to minimise the loss of significance to these assets whilst also looking for opportunities to enhance conservation and improve understanding of the historic environment.

Historic England publishes wide-ranging advice on the management and enhancement of the historic environment. GLAAS itself publishes advice on key topics for the management of



archaeology in London; notably on Archaeological Priority Areas (APA), standards for archaeological work and the significance of historic burial grounds.

We also work with partners to support the [historic environment research framework for London](#) focussing principally on those aspects of it which relate to strategic threats to the historic environment, management of information and the realisation of public benefit.

We expect to uphold publicly the advice we provide to local planning authorities. Unless material circumstances change, we will not alter our advice. It is for the statutory decision maker(s) to judge the balance of any competing interests.

## **2. Our role supporting development plan-making**

Working with Historic England's London Historic Places Team, we provide archaeological advice to the Mayor on the London Plan and to borough councils on local plans. This advice explains how undesignated archaeological assets should be identified, assessed, conserved and enhanced.

### **Greater London Historic Environment Record (GLHER)**

The Greater London Historic Environment Record provides a key resource to help identify heritage assets and the contribution of the historic environment, including its archaeology, to the character of a place. Our computerised record contains over 196,000 entries providing data on historic places, archaeological sites and finds, historic buildings, parks and landscapes and supporting sources of information. It is continually updated with priorities for enhancement reflecting the particular character of London, its historic environment, and the pressures upon it. The GLHER is also used to help predict the likelihood of discovering as yet unidentified assets.

### **Archaeological Priority Areas (APA)**

Archaeological Priority Areas (APA) define areas with particular potential for archaeological discoveries, based on current knowledge. [Historic England has published guidelines on the selection, definition and description of APAs in London](#) and is working with borough councils on a comprehensive review of their respective APAs.

The APA guidelines provide a consistent framework for documenting archaeological interest for planning purposes. A 'tiered' system distinguishes those areas which are most significant and sensitive to change from those which although still of interest are not quite so vulnerable. This will help local authorities, developers and their archaeological advisers to focus their resources and technical expertise on those development proposals where archaeological interests are a necessary and significant consideration for the decision-making process.

- Tier 1 is a defined area which is known, or strongly suspected, to contain a heritage asset of national significance (a scheduled monument or equivalent); or is otherwise of very high archaeological sensitivity.
- Tier 2 is a local area within which the GLHER holds specific evidence indicating the presence or likely presence of heritage assets of archaeological interest.
- Tier 3 is a landscape scale zone within which the GLHER holds evidence indicating the potential for heritage assets of archaeological interest.
- Tier 4 (outside APA) is any location that does not, on present evidence, merit inclusion within an Archaeological Priority Area. Tier 4 areas are not necessarily devoid of archaeological interest and may retain some potential unless they can be shown to have been heavily disturbed in modern times.

New information may lead to areas moving between the four tiers set out above. It is important to understand that the new system is intended to be dynamic and responsive to new information which either increases or decreases the significance of an area.

The new APA tiered system is being rolled out across London boroughs in accordance with a prioritised programme which will take some years to complete. It has been used to create a risk model and define new planning and development consultation criteria as explained in section 3.

### **Archaeological risk model**

The archaeological risk model gives a general indication of the likelihood that a development of a certain scale will have archaeological implications in each APA tier. It is not a substitute for site-specific assessment and field evaluation rather it gives an indication of the circumstances where such assessment is more or less likely to be necessary. At a strategic scale it could also rapidly indicate where site allocations proposed for development plans or 'permission in principle' are more or less likely to affect archaeological interests.



Archaeological risk model	Outside APA	Archaeological Priority Area		
	Tier 4	Tier 3	Tier 2	Tier 1
4 Large Major Site area 2 hectares or more	Medium* Low	High	High	High
3 Major Site area 0.5 to 2 hectares	Low	Medium	Medium	High
2 Minor Site area less than 0.5 hectares New basements	Negligible	Low	Medium	High
1 Very minor Householder developments** and equivalent minor works	Negligible	Negligible	Negligible	Medium

\* Very large majors with a site area of 10 hectares or more

\*\* Other than new or extended basements

**High risk** means developments likely to cause harm to heritage assets of archaeological interest and fairly likely to cause significant harm.

**Moderate risk** means developments fairly likely to cause harm to heritage assets of archaeological interest and sometimes causing significant harm. Because they are more common, moderate risk cases cumulatively pose an overall threat broadly equivalent to the high risk category.

**Low risk** means developments less likely to cause harm to heritage assets of archaeological interest and only rarely cause significant harm. But low risk is not the same as negligible risk: some sites in this category will have potential for new discoveries.

**Negligible risk** means developments only rarely causing harm to heritage assets of archaeological interest and hardly ever causing significant harm.

*Note: The archaeological risk model does not indicate in any way what this might mean for the commercial or other risks to proposed development for which independent archaeological consultancy advice should be obtained.*

### 3. When GLAAS should be consulted about proposals for development

These consultation criteria should be used by local planning authorities, or planning applicants, as a guide to identify which proposals should be referred to GLAAS for archaeological advice at both pre-application and decision-making stages:

#### Consult GLAAS on:

- ❖ All major planning applications over 0.5 hectares whether in an APA or not
- ❖ All Environmental Impact Assessment Scoping requests and Environmental Statements
- ❖ Any application supported by an archaeological desk-based assessment
- ❖ Minor planning applications in any APA (tiers 1 to 3)
- ❖ Domestic basement applications in APA tiers 1 and 2 only. Note: For boroughs as yet without APA tiers consult GLAAS on any domestic basement in an APA.
- ❖ Householder and equivalent-scale very minor applications in APA tier 1 only. Note: For boroughs as yet without APA tiers do not consult GLAAS on householder or equivalent applications unless within 50m of a scheduled monument.
- ❖ Proposed substantial demolition or major alterations to historic buildings
- ❖ Submission of details in relation to archaeological conditions
- ❖ Appeals on applications for which an archaeological issue has previously been identified

To consult GLAAS please email: [glaas@historicengland.org.uk](mailto:glaas@historicengland.org.uk)

Pre-application consultation with the local authority's archaeological adviser is strongly encouraged in these cases to ensure planning applications are supported by appropriate information.

#### Validation of planning applications

We recommend that as a requirement of validation all major applications within Archaeological Priority Areas (tiers 1-3) are expected to submit an archaeological desk-based assessment to accompany the planning application.

Some smaller-scale developments in Archaeological Priority Areas and major developments outside APAs may also warrant assessment but in other cases there will be no archaeological interest or it may be clear from existing information that a condition would provide sufficient safeguard. In these cases pre-application consultation with GLAAS can save the applicant time and consultancy fees.



### **Environmental Impact Assessment (EIA)**

The archaeological risk model can assist with screening archaeological interest for EIA purposes. GLAAS should be consulted on all applications for a scoping opinion for Environmental Impact Assessment. As a minimum, we would expect all EIA projects to consult the GLHER at the scoping stage - our advice helps to ensure that any potentially significant effects on undesignated archaeological assets have been accurately identified, assessed and addressed.

### **Nationally Significant Infrastructure Projects**

Historic England is a statutory consultee on all Nationally Significant Infrastructure Projects (NSIP). These are large scale projects such as power stations and railways. On these schemes, GLAAS provides information and impartial expert advice on undesignated archaeology as part of Historic England whilst liaising with the relevant local authorities.

### **Utilities and other works outside the planning system**

Many utility providers have a statutory obligation to consider the impact of their operations on archaeology whilst other organisations do so on a voluntary basis. In such cases GLAAS can provide information and impartial expert advice on undesignated archaeology.

- Only consult us for small-scale street works excavations within tier 1 APAs.
- We should be consulted on major utility projects in any APA, and in all locations for schemes meeting EIA thresholds.

To consult GLAAS please email: [glaas@historicengland.org.uk](mailto:glaas@historicengland.org.uk)

#### **4. Our Advisory Service**

We communicate all our formal advice by letter, normally sent electronically. We will assign a suitably qualified and experienced case officer. Our advice may also draw on the expertise of other members of Historic England staff, external specialists or our advisory committees and panels. It represents corporate advice on behalf of our Commission, our policymaking body.

##### **Providing advice - our commitment**

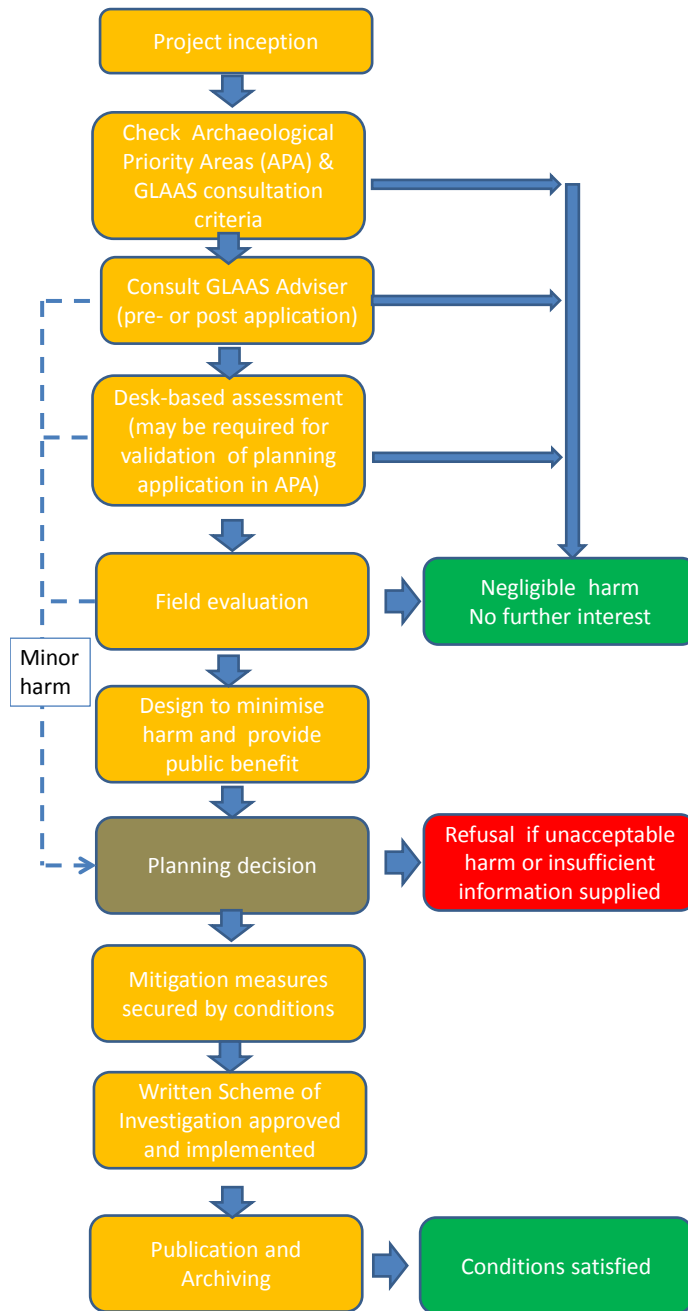
In cases where we have an interest, we will:

- identify the expectations of the client
- identify a named member of staff for each case, and provide contact details for them
- where necessary, source additional expertise matched to the needs of the case
- provide constructive, clear, relevant and concise advice, consistent with our Conservation Principles and the Chartered Institute for Archaeologist's Standard and Guidance for archaeological advice by historic environment services
- give advice to an agreed timetable
- review performance through evaluation and feedback

We do not undertake archaeological assessments or investigations ourselves, or act as consultants for developers. Where we have identified an archaeological interest prospective developers will need to engage an appropriately qualified archaeologist or practice. Information on such organisations and individuals can be obtained from the Chartered Institute for Archaeologists. <http://www.archaeologists.net/>

### Archaeology & Planning in Greater London: Process Flowchart

This flowchart illustrates the process and main steps to be followed for proposed developments with the potential to affect heritage assets of archaeological interest in London. Many developments can be quickly identified as causing only negligible or minor harm thus avoiding or simplifying subsequent steps.



### **Pre-application advice**

This is a service provided on behalf of the local planning authority, available to prospective applicants for planning permission potentially affecting undesignated heritage assets of archaeological interest. You will need to provide a 'red line' location plan, block plan of the proposed development and an indication of the nature and extent of groundworks. Once this information is received we will make an initial appraisal using the Greater London Historic Environment Record and within 21 days write back to either:

- confirm that we do not consider there is a need for further archaeological involvement with the case, or
- provide an explanation of the site's archaeological interest and recommendation as to how to proceed. This may include a recommendation to commission a professional archaeological desk-based assessment and/or field evaluation to inform the planning application and/or measures which might be taken to avoid or reduce harm. For complex cases it may be necessary to ask for additional information or a meeting, in order to gain a better understanding of the proposals and their impact.

Whether or not we become involved, it is important for those considering development to engage with others, such as the local planning authority, local community, relevant national agencies and national amenity societies, as appropriate. We commend the Local Government Association's 10 commitments for effective pre-application engagement and seek to follow them in our work. We collaborate with relevant parties and may make our advice available to others.

When we are consulted on infrastructure and other proposals with prescribed deadlines for response, we will aim to meet such deadlines, taking into account our corporate responsibilities and priorities.

To request pre-application advice please email: [glaas@historicengland.org.uk](mailto:glaas@historicengland.org.uk). Initial pre-application advice is free but for extended pre-application casework we may need to ask you to agree to a charged for service. Details of charged for advisory services will be published on our website once brought into operation.

### **Post-application advice**

This is currently a free service provided to and on behalf of the local planning authority, for planning applications potentially affecting undesignated heritage assets of archaeological interest. Advice will normally be instigated by the planning authority consulting GLAAS directly although occasionally cases are identified by third parties or from perusal of weekly planning lists. GLAAS will consider information submitted with the application, make an initial appraisal using the Greater London Historic Environment Record and within 21 days either:

- confirm that we do not consider there is a need for further archaeological involvement with the case, or
- provide an explanation of the site's archaeological potential and what further information is needed to reach an informed planning decision. This may involve a recommendation to provide a professional archaeological desk-based assessment and/or field evaluation.
- provide an explanation of the site's archaeological interest and recommendation as to how to proceed to determination. This may include a recommendation to secure measures to avoid or reduce harm, provide archaeologically related public benefits and/or to require archaeological investigation. Where necessary, appropriate planning conditions will be recommended.

For complex cases it may be necessary to ask for additional information or meetings, in order to gain a better understanding of the archaeological interest, the proposals and their impact. We expect to agree the scope of archaeological field evaluations in advance and may need to visit to inspect site works.

#### **Post-determination advice on archaeological investigations and other mitigation works**

This is currently a free service provided to and on behalf of the local planning authority, in relation to works required by planning condition to mitigate harm to undesignated heritage assets of archaeological interest. We will:

- provide informal advice to archaeological consultants on written schemes of investigation and mitigation strategies for preservation in-situ.
- provide formal advice to local planning authorities on the approval of written schemes of investigation and discharge of conditions
- monitor archaeological fieldwork
- provide general and site-specific advice on post-excavation assessment, analysis, archiving and publication
- advise the local planning authority if archaeological requirements appear not to be being complied with, and recommend remedial action where appropriate

We publish and regularly update [guidance on archaeological standards in London](#).

#### **Support for academic and community archaeology (including Heritage Lottery Fund projects)**

GLAAS encourages well considered projects which conserve archaeological sites or improve public access to and understanding of the capital's archaeological heritage. We also encourage academic researchers to draw upon evidence from Greater London. We can provide advice and



information - in most cases there will be no charge if the activities are non-commercial but if there is a substantial demand on our limited resources we may need to recover costs.

For groups preparing bids to the Heritage Lottery Fund (HLF) for projects which include or may affect archaeology the first step is to talk to the GLAAS archaeological advisor for your borough. They will check the Greater London Historic Environment Record, advise you on where to start and perhaps put you in touch with other organisations. The HLF will want you to show that you have discussed your project with GLAAS when you send us your grant application. The HLF has published [Archaeology Good-practice Guidance](#) which should be referred to when preparing a grant application.

## 5. Consulting the Greater London Historic Environment Record

The main role of the Greater London HER is to provide information on the historic environment in order to inform the planning process, but it is also to enhance understanding of the historic environment of Greater London generally.

The Greater London Historic Environment Record aims to respond to straightforward HER search requests within 7 working days. Where a shorter turnaround is required, for commercial users, a priority search is normally available with a response within 2 working days.

For those wishing to visit the record personally there is a public access desk available with a computer holding the GLHER database and associated Geographic Information System (GIS). An appointment must be made in advance in order to ensure staff are available to show visitors how to locate information and use the GLHER database. This is a free service provided in accordance with the Environmental Information Regulations 2004.

For those unable to visit the record personally, GLHER information can be emailed or posted. Generally this information includes:

- An html file or PDF document of GLHER records
- Details of any designated assets
- A map of the search area (with legend, but assets are un-labelled)
- Shapefiles of the above for use with Geographical Information Systems (GIS) for spatial mapping.

Other formats will be provided, where possible, on request.

Users must abide by all copyright restrictions pertaining to data held in the GLHER. Information supplied shall be used only by the user and for the purposes specified on the original enquiry. Written consent must be obtained for any other use of the data and for its dissemination to a third party. We reserve all rights of copyright which are owned in the material provided and such copyright must be acknowledged by the user.

Requests for information may be refused if it is considered that it may be used for any illegal activity. The information supplied may only be used for the purposes of the original request. If information is refused for any reason then a written explanation will be provided.

In addition the GLHER can be viewed via the Historic Environment portal: the Heritage Gateway, and through the Archaeological Data Service ArchSearch website. Please note that this is not a full version of GLHER database and is only updated periodically. As such it is not intended or licenced for commercial and planning work.



### **GLHER Charging Policy**

Charges are levied for a licence to re-use GLHER information for a specified purpose only in accordance with the Re-use of Public Sector Information Regulations 2015. A schedule of charges is published on Historic England's web site. Options for enhanced charged for GLHER services are being developed.

Method of Payment: Following the data request an invoice will be issued at the end of the month. Payments should be made within 30 days. Access to Historic England (chargeable) services may be suspended if payment is not made within this time.

For more information on the GLHER please visit our [webpage](#).

To request a search please email: [glher@historicengland.org.uk](mailto:glher@historicengland.org.uk) or telephone: 020 7973 3731 or 020 7973 3779



## **6. Contact Us**

We are committed to being transparent, clear and timely in the way we work. Our Charter sets out our role and remit, and explains what we need from you in order to provide advice.

We welcome feedback on the service you received from us.

### **Who to talk to**

When contacting our staff, please ensure you have the appropriate information so we can identify the case you are referring to, in particular the borough planning application number and our CLO number quoted on correspondence. Contact details for GLAAS are published on our [website](#).

If you know the name of our member of staff working on the particular case, please telephone them directly. If they are unable to resolve the issue to your satisfaction, please write to the Planning Director in the London Office who will look into and clarify the circumstances of the case.

London Planning Director, Emily Gee

Historic England, 1 Waterhouse Square, 138-142 Holborn, London EC1N 2ST

[london@HistoricEngland.org.uk](mailto:london@HistoricEngland.org.uk)

If you disagree with our advice and the responses you have received from both the member of staff dealing with the case and the Planning Director, you can contact the National Planning Director:

National Planning Director

Historic England, The Engine House, Fire Fly Avenue, Swindon SN2 2EH.

[Director@HistoricEngland.org.uk](mailto:Director@HistoricEngland.org.uk)

If he is unable to explain our position to your satisfaction, you can contact our Chief Executive:

The Chief Executive Historic England 1 Waterhouse Square 138142 Holborn London EC1N 2ST

[Chief.Executive@HistoricEngland.org.uk](mailto:Chief.Executive@HistoricEngland.org.uk)

### **Making a formal complaint**

If you consider that we have not followed our own published procedures and wish to make a formal complaint, please contact the Historic England appointed Compliance Officer:

Compliance Officer Historic England 1 Waterhouse Square 138142 Holborn London EC1N 2ST

[Compliance.Officer@HistoricEngland.org.uk](mailto:Compliance.Officer@HistoricEngland.org.uk)



If this does not resolve your issue, you may ask any Member of Parliament to refer your complaint to the Parliamentary Ombudsman:

The Parliamentary Ombudsman Millbank Tower Millbank London SW1P 4QP Telephone 0345 0154033 Website: [www.ombudsman.org.uk](http://www.ombudsman.org.uk) Email: [phso.enquiries@ombudsman.org.uk](mailto:phso.enquiries@ombudsman.org.uk).