The UK Government yesterday published its *Planning for the Future* white paper which sets out a radical proposal to overhaul the “sluggish” planning system in England.

The White Paper promises a huge amount; plentiful, affordable housing for key workers and young people, delivered in the places where it is needed, new jobs, and economic recovery, all while raising environmental standards and local democracy.

The only clear aims, however, are to improve the speed of decision making and provide certainty to developers over what they can build and where. The White Paper calls provisions of the current system which prevent this ‘red tape’.

We support effective planning to achieve the sustainable development and wish to ensure that archaeologists contribute to the timely delivery of high-quality homes and infrastructure. However, we reject the idea that deregulation is an effective route to better, or even more plentiful development, for which there is almost no evidence.

**We are therefore extremely sceptical about the ability of the Government’s proposals to deliver on its core goals.**

A major concern is that the White Paper is light on detail and fails to address the impact of development on our archaeological heritage. This is concerning because key elements of the reforms would seem to fundamentally undermine how this heritage is managed within the current planning system. Without any evidence to show that Government has considered these implications, we are conscious that a huge amount of pressure rests on the resolution of some key issues:

1. **Where does archaeology fits within the proposed system for Growth and Renewal areas?**

   Within the proposed system for ‘Growth’ and ‘Renewal’ areas, archaeology needs to be considered at both the strategic allocation stage, and at the level of individual development proposals.

   The White Paper does not consider processes for undertaking archaeological assessment. The proposed Growth and Renewal areas do away with planning applications, instead providing automatic or assumed permission for development of a pre-agreed type. This would bypass current processes for undertaking pre-determination archaeological evaluation.

   We need to know that archaeology will be considered at the strategic phase when local authorities and communities set the boundaries of these areas, and also that there will be a robust approach to enabling site specific archaeological investigation and mitigation dealt with by technical details consent.
Government recently confirmed that provision for archaeological investigation would form part of any proposed planning system. We wait to see detailed information to ensure that this will be the case.

2. **Most known heritage assets are undesignated, and much remains yet to be discovered.**

   *The system must recognise that heritage assets with archaeological interest are just as likely to occur in areas earmarked for growth as they are in protected areas.*

More than 90% of all known heritage assets are undesignated and that these assets make a key contribution to local placemaking and identity, as well as carrying vital information about our heritage. Many heritage assets also remain undiscovered and it is critical that processes for managing archaeological discoveries through the planning system exist.

The White Paper refers exclusively to designated assets and appears to make the assumption that we know where important heritage is and that we can draw a line around those places in order to protect them from development. The government needs to recognise that where archaeology is concerned, the vast majority archaeological sites and interests are undesignated, unrecorded, or as yet undiscovered.

The presence of archaeological heritage assets does not, in the vast majority of cases, prevent development. It is perfectly possible for growth areas to deliver new development while also allowing for archaeological investigation and increasing our knowledge of places. We need the proposals to include explicit provision for this.

3. **Front-loading archaeological assessments will require investment to improve baseline data and cannot completely replace site-specific evaluation of heritage assets.**

   *Local authorities cannot be expected to cover the costs of up-front assessment of archaeology in Growth and Renewal areas and developers must still fund site-specific investigation and mitigation.*

In a system of permissive Growth and Renewal areas, it might be possible to scope archaeological potential by adopting an approach to risk-mapping the archaeological potential for heritage assets. This approach requires good baseline data that is regularly updated. Substantial investment to assist in the production of archaeological risk maps for Growth and Renewal zones would be necessary. This would need to be in addition to site-specific evaluation and mitigation paid for by the developer and included in any technical details consent.

4. **A focus on design may limit broader benefits of placemaking**

   *We need to understand the past, local character, landscape and how people relate to places in order to create better places.*

The proposals for a ‘fast track for beauty’ along with strong emphasis on both locally-defined and national design codes could be a positive aspect of the new proposals. However, we also need to ensure that wider aspects of place-making are drawn upon when defining what ‘beautiful’ development should look like.

CIfA and CBA will be developing detailed suggestions for how Government might respond to these key issues over the coming week. We invite MCHLG representatives to meet with us to develop detailed proposals and discuss constructive opportunities.
to ensure that the historic environment is not damaged by these new approaches to planning.

Do you have specialist knowledge of this policy area?

We want your views to help us shape our response to this issue. If you would like to add your thoughts, please contact rob.lennox@archaeologists.net or neilredfern@archaeologyuk.org.