

Planning for the Future Consultation
MHCLG Planning
3rd Floor, Fry Building
2, Marsham Street
LONDON
SW1P 4DF

Dear Sir or Madam,

Planning for the Future: Response from the Society of Antiquaries of London

The Society of Antiquaries of London is a charity whose purpose is to promote understanding and appreciation of the human past particularly through the study of the past's material remains. Delivering public benefit from such studies, rooted in a tradition of research excellence, is a central concern. The Society comprises an elected college of some 3,000 Fellows, drawn from scholars and practitioners working in the fields of archaeology, architectural and art history, museology, conservation and cultural resource management together with ecclesiastical, documentary and heraldic study. The Fellowship therefore represents an extraordinary breadth of expertise and scholarship which the Society encourages and fosters for the wider public benefit.

Insofar as the challenges outlined in the Planning White Paper are an accurate analysis of the problems which have built up within the planning system since 1947, we agree that the approach of simplifying the regime, adding certainty to the decision-making, and improving the outcomes in terms of the quality of the built and the historic environment are paramount. We note the 36 recommendations in the Building Beautiful, Building Better Commission's 2020 report *Living with Beauty*, and agree with many of them in terms of their potential impact on the built heritage of our towns and cities. To the extent that the White Paper attempts to cement these ideas into future policy, we agree the approach wholeheartedly.

There is, however, an underlying layer to all this, in the often hidden resource of the archaeological record of places and sites, which the Commission's report barely mentions. Existing Government advice on Planning in the *National Planning Policy Framework*, last revised in 2019, and in its predecessor statement *Planning Policy Statement 5: Planning and the Historic Environment, 2010*, recognises the capacity for development to contribute to the wider social, cultural, economic and environmental benefits through the collection of information about the historic environment where its preservation cannot be secured within a development scheme.

The enhanced level of information about England's past over the last 30 years which has resulted from placing archaeological concerns and the protection of the historic environment firmly within the planning system is a national success story. Practice and experience have shown that the time and the costs that this adds to a development project are in proportion to other environmental factors that also have to be taken into consideration and represent a very small proportion of the overall total.

We recognise that more still needs to be done to ensure that the public value which has been hard won through this approach is properly realised, maintained, and maximised in any future system. The proposals set out in this White Paper must afford an opportunity to achieve this, particularly by decisions being informed by rapid digital access to data through enhanced Historic Environment Records, and by ensuring that existing and new data are used to help shape development and increase communities' knowledge and awareness of their past. We recognise the broad-brush nature of the White Paper proposals, but must continue to emphasise the importance of a proper

understanding of the full historical and archaeological context of development sites prior to any consents being granted or works taking place.

For a nation which values its past as it looks to make provision for the future, this objective remains fundamentally valid. Our responses to specific questions in the White Paper – which we are offering through the online questionnaire - are intended to assist the Government in ensuring that the precious resource of England's heritage is properly safeguarded within any altered approach to planning which results from this consultation.

There are some statements and proposals within the White Paper which make no provision for an online response. Our views on these are set out below.

Introduction: a new vision for England's planning system

Para 1.3, bullet 6 (reliance on 20th-century technology): Much of the information available to planners and developers about the historic environment consists of records about buildings, areas, sites and investigations which are not yet in digital form. Historic Environment Records (HERs), the main local collections of this information, are not a statutory requirement, and exist in differing formats in different parts of England. Standardisation, upgrading and digitisation of these, perhaps by the use of the proposed Infrastructure Levy, would be a benefit to the planning system and to the nation's heritage (see further the recommendations on how to improve and provide funding support for HERs in The Future of Local Government Archaeological Services, published May 2014, paras 5.5 – 5.23.)

Para 1.17, bullet 3 (make critical datasets digitally accessible): Historic Environment Records are one of the key datasets required for the smooth running of the planning system, and must be recognised as a key component of constraint mapping for protected areas. They are important not only for mapping constraints or protected areas, but also for underpinning local research frameworks, and for identifying key questions which the historic environment in sites under development can be expected to answer.

Para 1.18, bullet 5 (introduce a quicker, simpler framework for assessing environmental impacts): The historic environment is a non-renewable resource, which, if not recognised and planned for at an appropriate place within a system which aims at providing more certainty for developers, could be sacrificed in this drive for better and more beautiful homes. The promise of a quicker and simpler framework for assessing environmental impacts and enhancement opportunities makes this step sound easy, but the information base in HERs which underpins such a framework must be robust and comprehensive.

Para 1.18, bullet 10 (protect our historic buildings and areas): The absence of any specific reference to archaeology as a fundamental part of heritage is disappointing, particularly in the light of the really positive contribution that heritage and archaeological work make to building community identity, to 'placemaking', to context, and to good, sympathetic design.

Pillar 2: Section on Effective stewardship and enhancement of our natural and historic environment

Para 3.23: The ambitions in the 25-year Environment Plan need to encompass targets for heritage as well as mandatory net gains for biodiversity. The Environment Bill needs to pick up the lead established in this 25-Year Plan. We are concerned about the narrowness of the Bill's definition of 'environment' to exclude heritage despite one of its goals being

“Enhanced Beauty, Heritage and Engagement with the Natural Environment”. This is emphasised by the omission of heritage from the reporting requirements to both the Secretary of State and the proposed Office for Environmental Protection. This does not demonstrate the joined-up thinking clear in other parts of this consultation, nor does it suggest that stewardship of the historic environment will carry equal weight to considerations about other elements of our environment.

Proposal 15, para 3.26: If Local Authorities and communities are going to be expected to play a much greater and more direct role in defining local, spatially-specific policies, it is important that they can be given the tools with which to accomplish this task. For decisions and identifications such as these, good, clear, and understandable information about the historic environment and its significance will be at a premium. The case for Historic Environment Records to be a key data-set is fundamental to this.

Proposal 17, para 3.30: We endorse the commitment to ensuring that historic buildings play a central part in the renewal of our cities, towns and villages. In order to facilitate this, we need a more positive, and simpler, tax regime for repair, maintenance and conservation - including upgrading the energy efficiency of buildings. Work to historic buildings is still subject to 20% VAT, yet no VAT at all is charged on demolition or new build. Incentivising repair and measures for improving energy efficiency of historic buildings in a sympathetic way is much better for the environment. A smarter fiscal system would promote better outcomes, for heritage and for society.

Yours faithfully,

J S C Lewis
General Secretary