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25<sup>th</sup> October 2017

Dear Ms Elphicke

RE: Sir Mark Boleat, *The Housing problem in London, a broken planning system*

We at Rescue, The British Archaeological Trust, feel strongly that we should respond to Sir Mark Boleat's suggestion in his paper that there is a "bias against development" in the planning process.

In his report, albeit largely focused on London and its Green Belt, Sir Mark attempts to absolve developers from responsibility for the inability to provide sufficient new housing, denying self-evident practices such as 'land-banking' and manipulation of the market through management of supply, and blaming it instead on the planning system. In actual fact, since 2010 in particular, the entire strategy of the Coalition and subsequent Conservative administrations has sought to de-regulate the planning system and make it easier for development to happen, a process which is ongoing.

We are concerned that Sir Mark has failed to consider adequately the pressures that the planning system is under and the vital role that it fulfils.

Nowhere in the paper does he mention the systematic dismantling of planning departments resulting from local authority cuts, widely acknowledged as a problem, when such under-resourcing of these bodies clearly leads to delays and confusion.

No archaeological condition (or any other condition for that matter) is imposed at "the whim of a particular officer", but only in response to known threats to a diminishing resource and in accordance with acknowledged and agreed national and local planning policies that are already in place. Archaeological conditions are not "nice to have" as he suggests, but exist to ensure development does not destroy without responsibility. The Green Belt is considered as being a restriction on expansion – which is what it was designed to do in the first place. People do not "get away with" the list of assertions on page 22 – they are valid arguments put forward by level-headed groups with an interest in good development, rather than development at any cost. The presupposed standpoint here is that development is a creative and altruistic enterprise which we should all embrace, when the reality is that bad development can be damaging and destructive

to local communities. There is no mention of the need to avoid or regulate bad development within these pages, indeed the document appears to take the position that no profitable development can be construed to be a bad one.

Sir Mark's paper poses entitlement to a 15% profit margin for developers and seems to view planning conditions merely as a restriction on this by the arbitrary imposition of a series of tasks developers must undertake to make their proposals acceptable. The truth is that planning conditions mitigate environmental damage, ensure buildings are fit-for-purpose and usable, are safe to occupy, and attractive to look at. We also note that Sir Mark chooses as his illustrative example a house worth £500k with no reference to the discussion of the delivery of affordable properties on a 5% margin (or less) on behalf of desperate communities in the North of England, Cornwall or the Scottish Highlands. Although the paper focuses solely on London, the issue of housing supply is a national concern. Strategic thinking would dictate regeneration programmes beyond the crowded and unaffordable capital.

Rescue is concerned that whilst this paper has been presented as a considered critique of the housing problems facing this country, it clearly represents the biased viewpoint of a rapacious industry interested in increasing its already substantial returns and aware of a Government weak enough for it to chance its arm.

In many of our cities, Councils have spent the last 30 years remediating the poorly planned housing constructed in the 1960s (for example, at Hulme in Manchester), at a time when unregulated planning famously "*did more damage than the Luftwaffe*" to our urban landscapes and led to the submersion of some of our communities in massive, ill-thought out housing development (for example, at Thetford in Norfolk). The sentiments expressed in this paper risk a return to this period of development, the outcomes of which were behind the development of the planning systems and in particular, the environmental and heritage driven pre-commencement conditions.

If we are to have an "honest debate" about planning, as suggested by Sir Mark ("first requirement" p.22), then it must be a sensible dialogue where there is a recognition that the planning process exists to both facilitate development and to protect consumers and communities from the kind of unfettered and uncontrolled planning free-for-all whereby developers would be allowed to engage in maximum profiteering and exercise minimal responsibility.

We would be pleased to meet with members of the HFI Team to discuss our concerns, should you consider that would be helpful.

Yours sincerely



Jude Plouviez, Chair

cc. Sadiq Khan, George Osborne, Rt. Hon. John Healy, Rt. Hon. Alok Sharma

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