

Rescue

The British Archaeological Trust

15a Bull Plain, Hertford
Hertfordshire, SG14 1DX

Telephone: 01992 553377

Office hours: Tuesday and Friday mornings.
Otherwise please leave a message on the
answerphone.

office@rescue-archaeology.org.uk

Sir Mark Boleat
Chairman
The Housing & Finance Institute
CIPFA House
77 Mansell Street
London
E1 8AN

3rd November 2017
cc. Natalie Elphicke

Dear Sir Mark

Thank you for your prompt reply to our letter of 25th October; we appreciate the opportunity to respond. Your paper specifically singled out archaeological and environmental conditions as being non-essential and as a result our letter was perhaps more forthright than our usual tone. We take the threat to the historic environment implicit in your report very seriously; if implemented, your recommendations will undo much of the progress in archaeological management achieved during the lifetime of our organization.

Evidence for land-banking (and the consequent market manipulation) has been well reported over the last couple of years with the root of the discussion presented in an article by the Local Government Association (LGA) <https://www.local.gov.uk/topics/housing-and-planning/housing/house-building-england>. Other recent articles, including the Guardian 2015 piece that you cited, offer a broad enough spread to suggest a consensus that land banking is a real phenomenon, e. g.

- <http://blog.shelter.org.uk/2016/12/land-banking-whats-the-story-part-1/> -
- <https://www.economist.com/news/britain/21710853-companies-are-accused-driving-up-house-prices-land-banking-are-british-housebuilders>

The Guardian also highlighted it in 2014 in a piece specifically about London <https://www.theguardian.com/uk-news/davehillblog/2014/mar/02/london-housing-crisis-landbanking> following a report from GLA and a response from the then Mayor of London, Boris Johnson to a question about “stalled development” http://questions.london.gov.uk/QuestionSearch/searchclient/questions/question_48597. The GLA report did suggest that, in the capital at least, it wasn't the major housebuilders that were stalling on their permissions.

However our main concern, as an archaeological charity, is with the implications for archaeology and heritage of your suggested solutions. We have been campaigning to support local authority archaeological and conservation officers for many years and in that time we have seen their numbers dwindle – by as much as 35% since 2006 (<https://content.historicengland.org.uk/content/heritage-counts/pub/2016/heritage-indicators-2016.pdf>). We are pleased that you note that Local Planning Authorities are under-resourced, but it is unfair to suggest that the longer wait is somehow a deliberate ploy on the part of the LPA's, rather than the inevitable result of that under-resourcing. Your stance - whereby rather than providing planning departments with more resources, you would dismantle the planning protections that exist to, amongst other things, protect the historic and natural environment - is unacceptable.

We note that you report that developers would be prepared to pay more for more efficient planning services; a developer levy or the freedom for local authorities to charge market rates for their services is something that RESCUE would support. We contributed evidence to the 2014 Review of Local Government Archaeological Services by Lord Redesdale and John Howell, whose report has recently been released, and the implementation of a developer levy to fund adequate numbers of Local Government Archaeological Officers (which would help speed the process up and reduce risk), was recommended in that report, and supported by most contributors (including developers). However, this option has been almost immediately rejected by the Historic England group tasked with investigating the recommendations, apparently due to concerns from the development sector. Perhaps you could raise this with Historic England and encourage the revival of the proposal?

We are concerned about the figures you cite (p.26) regarding the cost to developers of delay caused by the imposition of planning conditions, and that these are in some way imposed at the personal “whim” of particular officers (p. 19); how is this calculated and from where are these references obtained? RESCUE can only really comment on archaeological conditions, but since the introduction of NPPF, preliminary archaeological investigative work (evaluation) is largely required pre-application, which should mean fewer delays and result in greater certainty about the scope and scale of any pre-commencement requirements.

The suggestion that archaeology and other environmental mitigation works involved in the development process are seen as being in some way additional, extra, unnecessarily delaying or just “nice to have”, is entirely false and we reject this argument. Properly researched and planned construction work should be able to manage its impacts with minimal time implications, and at appropriate levels of resourcing: the majority of delays and expense caused by environmental issues in planning are a result of poor project development.

I think we both agree that the imposition of the mandatory eight-week determination period for planning applications has led to a greater number of conditions, inevitable if the survey required cannot be completed at the time when the application is lodged (e.g. an ecology survey cannot be done in December). However, we must re-iterate our concern about the implication in your report that certain conditions, and you actually cite archaeological ones, are ‘nice to have’ but not essential. We are fortunate to live in a modern, civilized and relatively wealthy country; our archaeological heritage is an essential part of understanding how we got here. The recent Historic England report, Heritage Counts 2016, demonstrates the economic value of Heritage Tourism which contributed £21.7b to the national gross value added figure and that the heritage workforce comprised 328,700 jobs. The DCMS ‘Taking Part focus on: Heritage’ 2016-7 national survey reports that 74.2% of adults visited a Heritage site and that this figure is rising year on year. It also reports ‘that it was ‘important that heritage buildings and sites are well looked after’

to 94.2% of respondents. The award of the 2017 Stirling Prize for architecture to Hastings Pier demonstrates yet again that the historic environment and good development can complement one another, yet your approach and recommendations outline an adversarial approach. It is clear that most of the population care about our heritage and that the heritage based planning conditions whether associated with new building or renovation/conversion of old buildings are important to us as a nation – we would urge that this importance be respected and stress that the primary aim of planning should be to create a high quality public realm.

It is not our role to identify ways of increasing the housing supply that recognises that developers need to make a profit. Our role is to try to defend the historic environment from threat and to ensure that the drive for profit does not destroy the huge progress that has been made since the introduction of PPG16 in 1990. Of course, we fully acknowledge the housing crisis we face and the need to increase house-building, but this is a strategic issue for the country to solve, and the dismantling of current planning policies that serve to ensure that development enhances our communities is not the answer.

We are grateful for this opportunity to engage with you and look forward to hearing that you are willing to discuss, with us and others in the heritage sector, ways in which we can: increase resourcing to local planning authorities in order to speed up response times on planning conditions; continue to improve the preparation stage of construction projects to minimize delays and costs resulting from pre-commencement conditions; and continue to demonstrate the value that development-led archaeological work offers to the local and national community.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Jude Plouviez', written in a cursive style.

Jude Plouviez, Chair

RESCUE The British Archaeological Trust is an independent non-political charitable trust dedicated to supporting archaeology and the historic environment in Britain and abroad. As a charitable trust, RESCUE does not receive any state support, being entirely reliant on the contributions of subscribing members to support the organisation's work.