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Dear Mr Prior,

## **Reviewing the Nationally Significant Infrastructure Planning Regime: A discussion document**

Thank you for the opportunity to contribute to this review.

### **The Institute for Archaeologists**

The Institute for Archaeologists (IfA) is a professional body for the study and care of the historic environment. It promotes best practice in archaeology and provides a self-regulatory quality assurance framework for the sector and those it serves.

IfA has over 3,000 members and more than 70 registered practices across the United Kingdom. Its members work in all branches of the discipline: heritage management, planning advice, excavation, finds and environmental study, buildings recording, underwater and aerial archaeology, museums, conservation, survey, research and development, teaching and liaison with the community, industry and the commercial and financial sectors.

IfA's response focuses on the management and protection of the historic environment.

## **Reviewing the Nationally Significant Infrastructure Planning Regime**

### **General**

IfA welcomes the Government's desire further to improve the operation of the Nationally Significant Infrastructure Planning regime. Early and effective engagement is key to the management and protection of the historic environment and the Institute strongly supports the '*intentionally front-loaded system of consultation and engagement during the pre-application phase*' which is central to the regime (page 10 of the discussion document).

IfA also acknowledges the need for proportionality. However, even relatively minor works (whether carried out in isolation or, as here, as part of a larger programme of development) can have a disproportionate (and adverse) effect upon the historic environment. Any streamlining of the regime must continue to allow appropriate consideration of the impacts of development upon the historic environment. As paragraph 128 of the National Planning Policy Framework makes clear:

*'In determining applications, local planning authorities should require an applicant to*

*describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. ...*

*Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.'*

## **Specific Questions**

### **1. Improving the pre-application phase and ensuring consultation requirements are proportionate**

#### **(i) Do you agree with the explanation of the current issues that need to be addressed?**

1.1 Yes, save that, with regard to the historic environment, it should be made clear that issues of proportionality relate to the level of detail proportionate to the significance of the heritage asset in question and the potential impact of development upon it.

#### **(ii) Do you agree with the possible ideas which have been put forward and are there other ideas you would like to be considered?**

1.2 IfA supports the ideas for the Planning Inspectorate to provide earlier, improved and more structured advice, provided that the Inspectorate has, or has access to, archaeological and other historic environment expertise.

### **2. Improving pre-examination and examination phase**

#### **(i) Would you support the suggestion that relevant representations should be published as soon as they are received by the Planning Inspectorate?**

2.1 No. Such a practice may discourage early submission since parties submitting later would be able to comment on points made in the earlier submission.

#### **(ii) Are there any other issues relating to the examinations process other than those already identified in this section which you think need to be addressed?**

2.2 The Inspectorate should have, or have access to, archaeological and other historic environment expertise.

#### **(iii) Are there ways in which the information requirements which are placed on applicants at pre-examination and examination stages could be reduced?**

2.3 Possibly, but any reduction should not in any way inhibit an appropriate assessment of the impact of development upon heritage assets.

### **3. Changes to Development Consent Orders after consent is granted**

#### **(i) Do you agree with the idea of streamlining the current consultation and notification arrangements in cases where non-material changes to development consent orders are being made?**

3.1 Only, if 'non-material changes' were defined clearly to exclude changes which might have an adverse impact upon the historic environment.

#### **(ii) Do you think a distinction between minor and more significant material changes would provide a model for simplifying the process for changes to development consent orders?**

3.2 Only, if 'minor material changes' were defined clearly to exclude changes which might have an adverse impact upon the historic environment.

## **5. Improving engagement with local communities, local authorities and Statutory Consultees**

**(i) Do you agree with the views expressed to date about the issues faced by local authorities, communities and statutory consultees in engaging in the nationally significant infrastructure planning regime?**

5.1 IfA agrees that local authorities *'play a crucial role'* in the NSIP regime. With regard to the historic environment, the input of local authority archaeology and historic environment services makes a crucial contribution to facilitating sustainable development through the proper management and protection of heritage assets. Such services are increasingly at risk in the current financial climate and it is important to recognise the economic and social (as well as environmental) benefits that accrue from their work and continue to provide adequate resources properly to maintain that input.

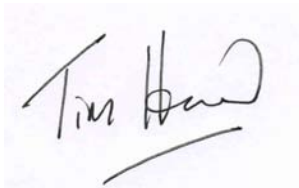
5.2 IfA recognises the importance of early and effective engagement with communities and with statutory consultees (including English Heritage). Consultation and engagement is, however, also needed with other stakeholders with expertise in the historic environment.

**(ii) Do you support the ideas for improvement which have been suggested so far for strengthening engagement are there any other ideas or solutions which you think should be considered?**

5.3 Yes. The Institute would be happy to provide archaeological input to any further guidance.

If there is anything further that I can do to assist please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink that reads "Tim Howard". The signature is written in a cursive style with a horizontal line underneath the name.

Tim Howard LLB, Dip Prof Arch  
Policy Advisor