



Rosie Bennet
Department for Communities and Local
Government
1/J1 Eland House
Bressenden Place
London SW1E 5DU

02 May 2014

Dear Ms Bennet,

Consultation on Planning Performance and Planning Contributions

Thank you for the opportunity to comment upon this consultation.

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.

Planning Performance and Planning Contributions

General Comments

IfA's major interest in this regard relates to the contribution of local authority archaeology and historic environment services to the consideration of planning applications. Such services play a crucial role in facilitating sustainable development through their assessment of, and advice upon, the implications of development for the historic environment – a role which IfA strongly supports. However, these services are increasingly under financial pressure, in some cases even calling into question their continued contribution to the development management process.

Where problems arise largely or wholly due to lack of resource on the part of local authorities, IfA is concerned to see that such problems are not compounded by the further withdrawal of resources as a penalty for under-performance. Although planning application fees are not paid directly to archaeology or historic environment services, any requirement to refund such fees should not be used as justification for reducing funding to those hard-pressed services.

Specific Questions

Question 1: Do you agree that the threshold for designating authorities as under-performing, based on speed, should increase to 40% or fewer of decisions made on time?

1.1 Only if sufficient resources are available to local authorities to ensure that such a level of performance is feasible

Question 2: Do you think there is scope to raise the threshold for under-performance above 40% (for example to 45% or 50%); and, if so, by when?

2.1 No. This should be re-assessed in future.

Question 3: Do you agree that authorities that have dealt with no more than two applications for major development, over the two year assessment period, should be exempt from designation based on their speed of decisions?

3.1 Yes.

Question 4: Do you agree that the tests set out at paragraph 21 of this consultation are appropriate for taking exceptional circumstances into account, prior to designations being confirmed?

4.1 No. Exceptional circumstances should be taken into account, but the second limb of the proposed test should be whether an authority has acted reasonably rather than whether circumstances are beyond its control. Where, for instance, an authority has to prioritise the allocation of scarce resources, its actions may be reasonable albeit not strictly outside its control.

Question 5: Is the Government's objective of aiding the delivery of small scale housing sites and expanding the self build housing market supported by:

- the introduction of a 10-unit and 1000 square metres gross floor space threshold for section 106 affordable housing contributions; and
- the exclusion of domestic extensions and annexes from section 106 affordable housing contributions?

5.1 No comment.

Question 6: Should the proposed exemption apply beyond affordable housing to other tariff style contributions based on standard formulae?

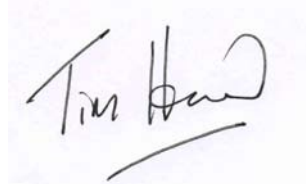
6.1 No comment.

Question 7: We would like your views on the impact on the Government's policy objectives to incentivise brownfield development through proposed national policy change. This would reduce the financial burden on developers by requiring that affordable housing contributions should not be sought where buildings are brought back into any use – other than proportionately for any increase in floor space.

7.1 IfA supports policies which encourage the reuse of existing buildings subject to normal planning criteria (including avoiding harm to the historic environment).

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

Yours sincerely,



Tim Howard LLB, Dip Prof Arch
Policy Advisor

Registered address: SHES, University of Reading, Whiteknights, PO Box 227, Reading RG6 6AB ☐ Tel: 0118 378 6446 ☐ Fax: 0118 378 6448
admin@archaeologists.net ☐ www.archaeologists.net

The Institute for Archaeologists is the trading name of the Institute of Field Archaeologists ☐ A Company Limited by Guarantee Registered in England Number 1918782 ☐ The Directors are the members of the Council of the Institute