This briefing briefly sets out our key issues relating to the to the Planning for the Future White Paper and our suggestions for developing policy proposals relating to archaeology and the historic environment.

We welcome the Government’s commitment to ensuring economic recovery through an ambitious programme of infrastructure spending and housebuilding. We are also keen to ensure that the planning system is both streamlined and effective. There is certainly room for improvement, and we want to work with government to ensure that development-led archaeology contributes to these goals by effective investigation, leading to greater understanding and conservation of heritage assets before and during development.

We are pleased to note that MHCLG has recently confirmed1 that the Government is committed to the protection of the historic environment and that “heritage considerations, including the need for archaeological surveys, will continue to be taken into account in bringing forward any planning reforms”. We have also received communications sent on behalf on ministers to a similar effect.

However, we are concerned that the proposals in the White Paper do not provide any information that confirms this intention. We recognise that there is a considerable amount of detail missing from the proposals and would like to work with MHCLG and DCMS to address these gaps and develop constructive policy proposals that will help the Government deliver on its commitment to the historic environment while delivering its radical vision for planning reform.

Robert Jenrick recently promised a meeting with MHCLG representatives to discuss the implications of the proposed reforms on the processes of safeguarding archaeological heritage through the planning system and develop positive solutions, although this meeting has not yet been confirmed.

Summary of issues:

1. Within the proposed system for ‘Growth’, ‘Renewal’ and ‘Protected’ areas, safeguards for archaeology need to exist at both the strategic area allocation stage, and at the level of individual development proposals.

1 https://www.parliament.uk/business/publications/written-questions-answers-statements/written-question/Commons/2020-07-15/74420/
We would like to confirm MHCLG’s intent to fill in gaps in detail in the White Paper proposals. We can advise on structured approaches to delivering safeguards and public benefits for heritage assets with archaeological interest.

II. The system must recognise that heritage assets with archaeological interest are just as likely to occur in areas earmarked for growth as they are in protected areas and that many assets are unrecorded, undesignated, or remain undiscovered. Within growth and renewal areas the proposals must have provisions in place for appropriate desk-based assessment of heritage assets and, where necessary, a field evaluation which can inform development management.

- We suggest work is undertaken with the archaeological sector to investigate an approach to ‘archaeological sensitivity mapping’ that will help local authorities to understand archaeological constraints, allocate suitable land for growth and renewal, and enable the avoidance and offsetting of harm to heritage assets in these areas. We consider that this approach has the potential to enhance strategic approaches to research, streamline mitigation, and improve innovation and public engagement, and we are keen to develop these opportunities.

III. Any front-loading of archaeological assessments at a strategic allocation stage will require additional funding to improve baseline data and conduct a high-level assessment of allocated areas. This front-loaded assessment, however, will not be able to replace site-specific evaluation of heritage assets.

- We wish to help scope and cost new processes for data gathering and archaeological evaluation that development areas will necessitate, and contribute to the development of reserved matters and technical details consent approaches to ensure that these process will be viable for undertaking site-specific evaluation of heritage assets.

IV. We want archaeology to fully contribute to a broad approach to the benefits of placemaking. In order to create better places that are meaningful to people Government must ensure that the past, local character, landscape and how people relate to places are understood. This requires a broader approach to placemaking which is focused on more than just design.

- We would welcome the opportunity to develop policies in the White Paper by incorporating the potential for heritage to contribute to beauty and design aims and also suggest further ‘fast track’ options for projects which deliver or enhance cultural capital, potentially to parallel biodiversity net gain.

The archaeological sector has adopted a cautiously positive approach to the proposals, recognising that at this stage the lack of information provides an opportunity to ensure that policies are developed in a way which is positive for the historic environment. We welcome the assurances that we have received to date. However, there remains a potential for archaeology to fall through the cracks if these positive policies are not forthcoming. We would welcome APPAG members’ assistance in drawing attention to archaeology as the reforms progress.