

The Chartered Institute for Archaeologists (CIfA) supports measures to remove unnecessary constraints on sustainable development, including house building which respects the historic environment. However, care needs to be taken not to *throw the baby out with the bath water*, particularly in relation to the planning regime.

CIfA has in recent years worked with Government and other stakeholders to ensure that planning legislation and policy (developed through PPGs 15 and 16, PPS 5 and, most recently, the National Planning Policy Framework and supporting guidance and advice) provide for the appropriate management and protection of the historic environment. This encompasses both designated and undesignated heritage assets (the latter representing more than 95% of the historic environment for which the planning regime is the only means of consideration and protection).

Current legislation and policy for the most part does provide a fit-for-purpose framework for such management and protection, but any attempt to reduce legislative and policy safeguards for the historic environment will not only make heritage assets vulnerable to irreversible harm, but also undermine efforts to provide sustainable housing development. Attempts to accelerate the delivery of housing through the planning proposals in the Housing and Planning Bill currently before Parliament have already caused grave concern in the archaeological sector. For instance, the proposals automatically to grant permission in principle to housing sites allocated on brownfield registers and in local and neighbourhood plans bring a real risk that sites containing heritage assets will be developed without adequate archaeological assessment and evaluation or the need to comply with appropriate planning conditions.

The best way to facilitate the delivery of sustainable housing development is not to ignore safeguards for the historic environment, but to invest in local authority historic environment services (including the historic environment records (HERs) maintained by them) which make a crucial contribution to the early identification and assessment of heritage assets and ensure the proper management and protection of those assets. Such investment prevents unnecessary harm to heritage assets and minimises the delay and expense which can be caused by failure to address the historic environment early in the development process.