



Darren McCreery  
Streamlining the planning application process – Consultation  
Department for Communities and Local Government  
1/J3, Eland House  
Bressenden Place  
London SW1E 5DU.

27 February 2013

Dear Mr McCreery,

## **Consultation on streamlining the planning application process**

Thank you for the opportunity to comment on 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.

### **Streamlining the planning application process**

#### **General**

IfA supports Government in its aim to remove unnecessary obstacles to the achievement of sustainable development. IfA's primary interest in this regard is with the operation of the planning regime insofar as it impacts upon the historic environment and it is concerned to see that any attempts to streamline the process do not inadvertently remove reasonable and proportionate safeguards for the historic environment.

The precise nature and extent of archaeological remains in any given area are often unknown and it is legitimate, in appropriate circumstances, to expect archaeological work (in the form of assessment or evaluation) to be carried out prior to the submission of an application (see paragraph 128 of the National Planning Policy Framework). Any changes in the approach to validation must be flexible enough to allow information to be requested where there is archaeological potential which may or may not subsequently be found to be a material consideration in determining the application.

Furthermore, IfA would like to see the provisions relating to Design and Access Statements amended to include more specific requirements for information relating to the historic environment addressing the significance of any heritage assets and the impact of any proposals on that significance (produced in accordance with clear professional standards). Where proposals may

affect archaeological remains, this should, as a minimum, include a desk-based assessment carried out in accordance with the IfA Standard and guidance for desk-based assessments (<http://www.archaeologists.net/sites/default/files/node-files/DBA2012-Working-draft.pdf>).

In practice, the desire to ensure that relevant and proportionate material is produced in order properly to consider the archaeological implications of any application might best be achieved by a requirement for archaeological information to be submitted by an accredited professional. (IfA maintains a Register of accredited organisations at <http://www.archaeologists.net/ro> and holds a directory of members.)

## Specific Questions

### **Question 1. Do you agree with the proposal to reduce the number of minor applications which require a Design and Access Statement by raising the threshold?**

1.1 No comment, save that, where 'minor development' may have a significant impact upon the historic environment, IfA would like to see a requirement to produce appropriate information relating to the historic environment and the potential impact upon it, as discussed above.

### **Question 2. Do you think that major development is the right threshold for requiring a Design and Access Statement? If not, what should the threshold be?**

2.1 No comment, save that the need for information relating to the historic environment should be assessed on the basis of the potential impact upon the historic environment (rather than the size of the proposed development).

### **Question 3. Do you agree with the proposals to require a Design and Access Statement for some smaller schemes in World Heritage Sites and Conservation Areas, in addition to major development and listed building consents?**

3.1 Yes, although IfA would also wish to see more specific information relating to the historic environment in these (and other) cases.

### **Question 4. Do you agree with the proposed simplification of the statutory content of Design and Access Statements?**

4.1 Only if this was accompanied by a more specific requirement for information (as appropriate) relating to the historic environment.

### **Question 5. Are there any further changes that could be made in respect of Design and Access Statements?**

5.1 See under question 4.

### **Question 6. Do you have any comments on the changes to local lists and validation, as set out in paragraphs 39-46 above and reflected in the draft legislation in Annex 2?**

6.1 See the general comments above with regard to validation. The proposal in paragraph 45 of the consultation document (and in article 4 of the draft Order) that '*information requests should relate to matters that it is reasonable to think will be a material consideration*' should be changed to read: '*information requests should relate to matters that it is reasonable to think may be a material consideration*'.

### **Question 7. Do you have any comments on the procedure for challenging information requests at the validation stage as set out in paragraphs 52-54 above and reflected in the draft legislation in Annex 2?**

7.1 No, save that IfA would be concerned if the use of this procedure in any way inhibited the necessary and proportionate assessment of the archaeological implications of development.

**Question 8. Do you agree with the proposal to remove the statutory requirement, when planning permission is granted, to provide a summary of reasons for approval and a summary of the relevant policies and proposal considered on written decision notices?**

8.1 Yes.

**Question 9. Do you have any comments on the assumptions and analysis set out in the consultation stage impact assessment?**

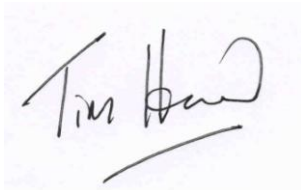
9.1 No.

**Question 10. In particular, do you agree that £500 is an accurate reflection of the costs associated with creating a Design and Access Statement for minor development? If not, what do you consider to be a more realistic figure?**

10.1 No comment. Such specific matters are better addressed by our members and registered organisations individually.

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 and is positioned above a horizontal line.

Tim Howard LLB, Dip Prof Arch  
Policy Advisor