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British Archaeology



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6 TESTS FOR PLANNING

JUNE 2021



Summary score card

The government will be scored red, amber and green against each of these tests following the response to [Planning for the Future White Paper](#) (PWP) consultation

1 Local democracy and community engagement	Retain and enhance genuine and accessible community participation and accountability throughout the planning process in all areas	
2 Affordable housing and developer contributions	Deliver an evidenced strategy to build genuinely affordable homes, incentivise build-out, and provide local authorities with the power to turn down developments which do not deliver affordable housing	
3 Climate and sustainable development	Accelerate climate action to meet the UK's net zero targets and UN's Sustainable Development Goals, and ensure that local planning authorities are empowered to deliver ambitious, climate-friendly developments	
4 Biodiversity and nature's recovery	Protect sites important for biodiversity and nature's recovery, and require fit-for-purpose contributions for nature from all developments	
5 Beauty and heritage	The conservation of heritage and designated landscapes are safeguarded against inappropriate development and their enhancement prioritised, aided by robust data collection, appropriate resourcing and strong community participation	
6 Health and wellbeing and access to natural green space	Embed human health, wellbeing and equality in the planning system, including priorities for access to natural green space, active travel and reducing air pollution	



Local democracy and community engagement

In the Planning for the Future White Paper (PWP), the government has an ambition to build a society that has powerful links between identity and place, with communities that are connected to a planning process that is meant to serve them and residents who are more engaged over what happens in their areas.

It aims to “democratise” the planning process, to champion “careful stewardship” and a system that is “open to a wider range of people.”

Concerns

- Limited proposals on diversifying and increasing the numbers of people engaging in the planning process
- Proposals to restrict community engagement and decision-making to the local plan stage, with removal of the ‘right to be heard’ at local plan examinations
- Reduced time-scale for plan preparation
- Unknown future of, and potentially reduced scope for neighbourhood planning
- Proposals to move to engagement through digital platforms only with such engagement limited to local plan and local design code formation

Indicators

- Increasing diversity of the people who take part in the planning process is considered throughout
- Proposals clearly demonstrate that community engagement and local scrutiny is retained and enhanced throughout the planning process, with no reduction in local democratic decision making on individual applications and developments
- Retention of existing legal right for the public to be heard at local plan examinations
- Mechanisms for local communities and local planning authorities to hold developers to account on their projects
- Allow for significant and early local engagement in the shaping of master plans and design codes/briefs, and powers to local planning authorities to ensure they are upheld
- Increased support for neighbourhood planning
- Local knowledge is embraced in the planning system, including recognition of the value citizen science in providing essential evidence to guide planning decisions, and innovative proposals for enhancing and complimenting the consultation process put forward such as citizen assembly models



Affordable housing and developer contributions

The PWP emphasises the need of affordable housing provision and suitable infrastructure on new development. It aims to increase the supply of land available for new homes where it is needed to address affordability; to raise more revenue than under the current system of developer contributions and deliver more on-site affordable housing; and to allow local planning authorities to increase provision of affordable homes. It recognises the potential of affordable homes to address social inequalities, and pledges that the new Infrastructure Levy will be more transparent than [Section 106](#), and local communities will have more control over how it is spent.

Concerns

- Replacement of Section 106 and Community Infrastructure Levy without proof-of-concept demonstrated ability of the Infrastructure Levy to deliver at least as much affordable and social housing
- No further proposals on increasing the delivery of affordable and social homes
- No evidence that the recommendations of the [Letwin Review of Build Out rates](#) will be integrated into the new planning system
- No ring-fencing of funding for green or sustainable transport infrastructure or for biodiversity

Indicators

- Infrastructure Levy which is proof-of-concept and reflects the true value of developments
- Loopholes to provision of developer contributions are closed and no new ones created
- Prioritising and incentivising the delivery of affordable homes
- Implementation of Letwin review of Build Out recommendations
- Local planning authority powers to refuse developments without adequate affordable housing provision
- Fit-for-purpose developer contributions arrangements, for green and sustainable transport infrastructure and for biodiversity (the delivery of nature-rich accessible greenspace value, strategic biodiversity mitigation scheme, and nature-friendly new development).



Climate and sustainable development

The government has outlined the aim to use the planning system to tackle climate change and support sustainable growth that unlocks opportunity in all parts of the country. The PWP proposes to maximise suitable brownfield land, reduce our reliance on carbon-intensive transport and build energy-efficient homes.

Concerns

- No comprehensive recognition of the role of the planning system as a key mechanism in driving holistic decarbonisation or achieving climate adaptation through site location, orientation and whole site design
- Little mention of existing requirements or statutory duties for local plans to pursue carbon emission reductions in line with the [Climate Change Act](#) or to deliver ‘future-proofed’ resilient development as per the commitments in the [UK’s Adaptation Programme](#)
- No clarity on how the proposed ‘single statutory sustainable development test’ will work, or how to ensure it will encompass all aspects of sustainable development
- Nothing to address the planning system’s overwhelming tendency to promote car-dependent development

Indicators

- Preservation of local planning authorities’ ability to set standards, notably on energy efficiency, above the national minimum in order to meet earlier local net zero targets
- An overarching vision for land use or national spatial strategy to ensure the right development in the right places
- Plans to develop clear, underlying metrics for carbon accounting, monitoring, reporting and securing climate adaptation plan-making and site allocation decision-making
- A zero-carbon standard introduced before 2024, for all new buildings which will remove the need for any future retrofitting
- The ability for design codes to be set at higher requirements than the government’s minimum, with action to address the climate mitigation and adaptation areas outlined in the model design code specified as part of the key minimum requirements for all codes, ensuring they focus first how places function within a climate adapted, zero carbon world
- Retention of existing legal duties for plans to address climate change
- Promotion of sustainable development should be required at plan-making and decision-making level
- A ‘sustainable development test’ which is based on the UN’s Sustainable Development Goals, with a strengthened legal duty to deliver sustainable development, and explicit objectives for the planning system to achieve and contribute to achieving net zero by 2050 and nature’s recovery
- Strengthening planning practice guidance and the NPPF to promote strategic planning to support development in sustainable locations and to reject car-dependant development



Biodiversity and Nature's recovery

The Planning White Paper emphasises that the planning system is central to improving biodiversity and maximising environmental benefits, and supports net gain for biodiversity and the wider environment. Its ambitions include leaving an inheritance of environmental improvement, with environmental assets protected and more green spaces provided for generations to come. The planning system is critical to enabling the delivery of the Government's commitment to a specific duty to set a legal target for species abundance for 2030, aiming to halt the decline of species in England, and recovering species by working on habitats both within protected sites and in the wider countryside and urban areas.

Concerns

- Proposed changes to the planning system would weaken protection of natural and other green space in areas designated for 'growth' or 'renewal', and offer no additional safeguards for those earmarked for 'protection', and no requirements for all land categories to include space for nature
- No consideration of importance or protection of undesignated green spaces or habitats important to nature's recovery that have been or are yet to be identified as such
- No powers for local planning authorities to guide developments into the most sustainable locations or harness developer contributions towards nature-rich spaces and wildlife friendly development

Indicators

- Protective measures for priority habitat and existing conservation designations should be enhanced so that development is strictly prohibited in these areas. Through better strategic planning, reinforcement of the mitigation hierarchy, and by strengthened environmental assessments like [Environmental Impact Assessments](#) and [Strategic Environmental Assessments](#)
- A new planning designation for the purposes of enabling the recovery of nature should be introduced, and given formal weight in the planning system through Local Nature Recovery Strategies
- Requirements for site specific surveys, Environmental Impact Assessments and, Strategic Environmental Assessments and [Appropriate Assessment](#) are maintained
- All developments, including major infrastructure projects, are required to contribute to [biodiversity net gain](#) (BNG), with BNG being additional to already existing legal requirements, and with clear mechanisms which allow for remedial action where promised outcomes are not realised
- Proposals to allow local planning authorities to prioritise the development of suitable brownfield land with the lowest biodiversity potential or accessible greenspace value, first



Beauty and heritage

The Prime Minister has outlined his vision of a planning system which actively encourages sustainable and beautiful development. The Planning White Paper adds that it must also protect and preserve our architectural heritage and historic buildings and areas. It advocates for careful stewardship and a greater focus on ‘place-making’, creating places that can become the heritage of the future. It expects that design guidance and codes will be prepared locally and to be based on genuine community involvement rather than meaningless consultation, and ensure that codes have real ‘bite’ by making them more binding on planning decisions.

Concerns

- ‘Beauty’ narrowed down to aesthetic criteria only and lacks detail on how it might be achieved
- ‘Fast-track for beauty’ limits the creation of developments that are fit for the future
- Weakening of early site-specific surveys assessment and evaluation and no strengthening of current evidence base of environmental information
- No further protections for irreplaceable heritage and habitat assets beyond current system protections
- Lack of assurances that local planning authorities will be given the powers to go above and beyond national design codes
- Lack of direct reference to archaeology and how this will be embedded in the new system

Indicators

- Evidence that the definition of ‘Beauty’ reflects the definition that was given by the Building Better Building Beautiful Commission, particularly that of local democracy and sustainability of place and for nature and landscape
- Enable decisions to be based on properly resourced data and evidence, with the right capacity to pursue remedial action where promised outcomes are not realised
- Retention of the role of early site-specific assessment and evaluation and the improvements in the way data is handled and shared
- Public interest in conserving and enhancing designated landscapes and irreplaceable assets is prioritised over meeting and delivering on local plan housing targets, and are no-go areas for development
- Local planning authorities given powers through local plans and design codes to plan for ambitious green infrastructure which go beyond that of minimum government design standards, with no loopholes which allow them to be weakened
- Robust mechanisms to ensure archaeology is embedded in the new system



Health, wellbeing and access to local green spaces

The Secretary of State pledged that a new planning system would provide homes with green spaces and new parks at close hand, and communities where tree-lined streets are the norm. The White Paper acknowledges that where we live has a measurable effect on our physical and mental health and states that the National Model Design Code will deal with issues such as the arrangement and proportions of streets and urban blocks, positioning and hierarchy of public spaces, successful parking arrangements, placement of street trees, and high-quality cycling and walking provision.

Concerns

- No commitment that the planning system should contribute to human health, wellbeing and equality
- Increased risks of air and nutrient pollution resulting from poorly located housing development
- No strengthening of protections for local green spaces with the normal planning application process still applicable on green space that is considered 'protected'
- No requirement for all development to accommodate or contribute to high quality green infrastructure with accessible natural green space - for both people and wildlife
- No reference to the role of Active Travel England as a statutory consultee for larger new developments
- No commitment to 20-minute neighbourhoods, which would help create places in which most of people's daily needs can be met within a short walk or cycle

Indicators

- Commitment to sustainable development which also contributes to human physical and mental wellbeing and only pursuing developments which are understood to have benefit on future health
- The future of environmental assessments should consider the human health and pollution impacts of developments
- Local green spaces are given adequate protections in the system and their importance for communities are recognised
- Strategic approach to planning for walking and cycling, accessible natural green spaces and green infrastructure
- Clarity on the role of Active Travel England as a statutory consultee to ensure pedestrian and cycle friendly design in larger new developments
- Commitment to promote 20-minute neighbourhoods or 15-minute cities