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**Response by the Association of Local Government Archaeological Officers to the Department for Culture, Media and Sport Consultation:- Relaxing the restrictions on the deployment of overhead telecommunications lines, November 2011.**

ALGAO is a UK-wide organisation representing local government archaeology services at County, District, Metropolitan, Unitary and National Park authority level. These services maintain Historic Environment Records (HERs) and provide advice to all the District, Unitary and other local government bodies in the country. ALGAO:UK co-ordinates the views of its member authorities and presents them to government and to other national organisations. It also acts as an advisor to the Local Government Association (LGA) on archaeological matters. The range of interests of our members embraces all aspects of the historic environment, including archaeology, buildings and the historic landscape.

The historic environment is vulnerable to change, once destroyed archaeological evidence is lost for ever. Mitigation strategies can be developed for historic assets that are under threat, based upon an understanding of their significance and the degree of impact of change proposed; this approach is set out in Government legislation and policies on the historic environment. This legislation and policy includes the *Ancient Monuments and Archaeological Areas Act 1979*; *PPS5: Planning for the Historic Environment (2010)* in England; *Planning Advice Note, PAN 42: Archaeology - the Planning Process and Scheduled Monument Procedures (1994)* in Scotland and *Planning Policy Wales (2011)* in Wales.

We welcome this opportunity to comment on the Government's proposals for a relaxation of the restrictions regarding overhead telecommunications lines.

**In response to Consultation Question 3:**

**Do respondents believe that notification and consultation of planned works in local newspapers and through a qualifying body such as Parish Councils or Neighbourhood Forums, where one exists, to be sufficient?**

**Answer: NO**

ALGAO recognises the need for communications infrastructure, and the importance of appropriate siting and design. We are concerned to ensure that appropriate measures are in place to allow the significance of the historic environment to be affected by planned works, and the degree of impact of these planned works upon that significance, including setting, to be assessed and for appropriate mitigation measures to be implemented.

We are supportive of the proposals for communities to be notified (para 3.8) and to have their input and to discuss proposals with the communications provider (para 3.7). However, we are not clear how the communications provider will identify and address historic environment considerations. We would suggest that consultation of relevant Historic Environment Records would act as a starting point for the identification of known historic environment constraints, however, this should be accompanied by the seeking of specialist historic environment advice. Such information and advice is provided through the current mechanisms of local planning authority consultation as part of the planning process.

Whilst World Heritage Sites are mentioned in the consultation document, there is no mention of other designated heritage assets, such as scheduled monuments and listed buildings, nor of the undesignated historic environment resource. We are keen to see these heritage assets afforded the same degree of protection as part of planned works for communications infrastructure as they are under the relevant national legislation and planning policies referred to above.

We would welcome clarification of the procedures which are intended, as a result of this proposal for a relaxation of the restrictions, to ensure that historic environment considerations of planned works are identified and addressed.

Gail Falkingham, on behalf of ALGAO:UK

Secretary of ALGAO:England Planning & Legislation Committee & member of ALGAO:England Executive Committee

20 February 2012