



Peter McDougall
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21 February 2012

Dear Mr McDougall,

Consultation on relaxing the restrictions on the deployment of overhead telecommunications lines

Thank you for the opportunity to comment upon proposals for relaxing the restrictions on the deployment of overhead telecommunications lines.

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.

Consultation Questions

1. Approximately how much of the network will be built using this relaxation, and are the cost and benefit estimates in the impact assessment accurate?

No comment, save that the impact assessment should make reference to the potential negative impacts on buried archaeological remains if lines are installed underground in addition to the negative environmental impacts of the deployment of overhead lines which are (quite rightly) identified at page 12 of the impact assessment.

2. Do respondents agree that existing infrastructure should be used, if possible, before new overhead deployment can take place?

Yes.

Do respondents agree that communications providers should be required to demonstrate that sharing of existing infrastructure has been examined?

Yes.

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?

No. Although IfA supports consultation with local communities (and notwithstanding the provisions in the existing Electronic Communications Code Regulations 2003 with regard to conservation areas, listed buildings and scheduled monuments), wider consultation is required with other stakeholders to ensure that the historic environment generally is adequately managed and protected.

4. Do respondents believe this notification and consultation would place a significant and onerous burden on communications providers that may be planning these works?

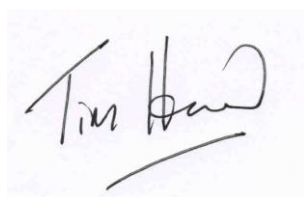
No.

5. We are committed to amending the Electronic Communications Code (Conditions and Restrictions) Regulations 2003 in order to relax the rules on new overhead deployment but would welcome feedback on any aspect of the proposals as to how this should be achieved outlined in the consultation.

The potential effect on the historic environment of the deployment of telecommunications systems both underground (particularly in terms of the effect on buried archaeological remains) and overhead (particularly in terms of the effect on historic landscapes and on the setting of other heritage assets) needs to be taken into account when considering any amendment to the 2003 Regulations and, thereafter, when consideration is given to the deployment of such systems pursuant to those Regulations. The Regulations should ensure that the historic environment is properly considered and adequately managed and protected throughout the process.

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, appearing to read 'Tim Howard', with a horizontal line underneath.

Tim Howard LLB, Dip Prof Arch
Policy Advisor