



Sean Kenny
Department for Culture, Media and Sport
2-4 Cockspur Street
London SW1Y 5DH

13 March 2013

Dear Mr Kenny,

Consultation on proposed changes to siting requirements for broadband cabinets and overhead lines to facilitate the deployment of superfast broadband networks

Thank you for the opportunity to comment on these proposed changes.

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.

Proposed changes to siting requirements for broadband cabinets and overhead lines to facilitate the deployment of superfast broadband networks

General

Although IfA supports Government in its ambition to improve the UK's communications infrastructure, it continues to have concerns with regard to potential harm to the historic environment if deregulation occurs without adequate safeguards for the historic environment. These concerns were expressed in IfA's response to consultation on related changes to the permitted development regime dated 20 December 2012 (copy enclosed for information).

Specific Questions

1. Do respondents agree with the proposal to extend the relaxation of the restriction on the deployment of overhead infrastructure to protected areas, and to remove the prior approval requirement for protected areas?

1.1 No, if and insofar as 'protected areas' include World Heritage Sites, conservation areas, listed buildings and scheduled monuments. (The reference to 'protected areas' in Regulation 8 of the 2003 Regulations does not, however, appear to include such assets.)

1.2 With regard to prior approval, IfA's concerns remain as set out under question 10 in its said

letter of 20 December 2012. With regard to the deployment of overhead infrastructure, this has potential significantly to harm heritage assets (and their settings) and, when such assets are involved, should be the exception rather than the rule.

2. Approximately how much new network will be built using the overhead line change, in terms of new poles and kilometres of lines. Do you agree with the assumptions and cost savings set out in the consultation stage impact assessment (annex A)? Are there any other costs or benefits that you think should be included in this assessment?

2.1 No comment.

3. Do respondents agree with the proposed consultation arrangements for the deployment of apparatus in protected areas?

3.1 Yes, on the assumption that Regulations 6 and 7 (relating to conservation areas and listed buildings and scheduled monuments) remain in force. In any event, IfA strongly supports the development of a code of best siting practice and the involvement of English Heritage in that process.

4. Do you agree that the duration of the proposed changes being limited to 5 years?

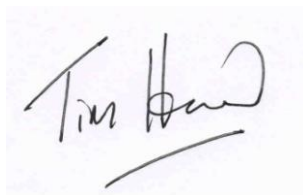
4.1 If and insofar as such changes affect heritage assets, limiting the duration of the proposed changes will not avoid harm to the historic environment.

5. We would welcome feedback on how any aspect of the proposals outlined in this consultation should be achieved.

5.1 In order to achieve a proper balance between the various considerations discussed in paragraph 3.2 of the consultation document, any reference to the need (on the Secretary of State's part) to promote economic growth should be a reference to the need to promote sustainable economic growth.

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 with a horizontal line underneath the name.

Tim Howard LLB, Dip Prof Arch
Policy Advisor