



Red Tape Challenge  
Cabinet Office

27 February 2013

Dear Sir / Madam,

## **Red Tape Challenge: Planning Administration**

Thank you for the opportunity to comment as part of the Red Tape Challenge.

### **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.

### **Planning Administration**

In responding to this challenge, the Institute's primary concern is with the effective management and protection of the historic environment. In this regard fit for purpose secondary legislation plays a crucial part in facilitating the efficient operation of the planning regime, in particular with regard to the management and protection of undesignated heritage assets (which represent more than 95% of the historic environment and for which the planning regime is the only means of consideration and protection).

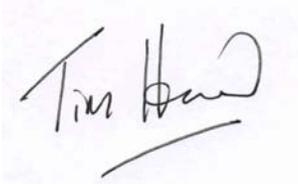
Nevertheless, there is clearly scope to streamline and consolidate secondary legislation in the following respects

- statutory instruments that have been largely or wholly superseded or have lapsed (see appendix 1). These instruments could be revoked in their entirety or with minor savings
- statutory instruments that have little or no relevance to the historic environment. IfA would not object to the revision or revocation of these instruments on historic environment grounds, but there may be other grounds for retaining such provisions (see appendix 2)
- statutory instruments whose retention is important for the historic environment, albeit in some cases this may be in a consolidated and/or streamlined form (see appendix 3).

The piecemeal way in which statutory instruments have hitherto been revised and updated (whereby the amending statutory instrument requires to be read with the original instrument and any intermediate revisions) is unsatisfactory. For instance, it is difficult, if not impossible, easily to grasp the current nature and extent of permitted development rules in the absence of a single, consolidated document. There is considerable scope for consolidation in this and other areas and future, amending instruments should consolidate the previous provisions.

If there is anything further that I can do to assist please do not hesitate to contact me.

Yours faithfully,

A handwritten signature in black ink that reads "Tim Howard". The signature is written in a cursive style with a long horizontal stroke at the bottom.

Tim Howard LLB, Dip Prof Arch  
Policy Advisor