

Helen Marks
Permitted Development Rights – Consultation
Department for Communities and Local Government
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Bressenden Place
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By email to: planningimprovements@communities.gsi.gov.uk

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Dear Ms Marks

Extending permitted development rights for homeowners and businesses

The Campaign for National Parks is the independent national voice for the 13 National Parks in England and Wales. Our mission is to inspire everyone to enjoy and look after National Parks – the nation's green treasures.

National Parks are our finest landscapes with the highest level of protection. Their statutory purposes are to conserve and enhance wildlife, cultural heritage and natural beauty, and to promote opportunities for public enjoyment and understanding of their special qualities. For over 75 years the Campaign for National Parks has been working to ensure that our National Parks are beautiful, inspirational places that are relevant, valued and protected for all.

National Parks contribute significantly to the well-being of the nation, by providing safe, attractive, healthy places for recreation. They also play a vital role in sustainable development through protection of the landscape, wildlife and key environmental resources and services, like water provision and carbon storage in peat soils and forests, which can mitigate the effects of climate change. As well as being inspiring places for people to enjoy and improve their health and well-being, National Parks make a significant contribution to the economy through tourism, farming, and other related businesses.

Our response focuses on Questions 9 and 10 of the consultation document which specifically refer to Article 1(5) land. We have also provided some comments on the Impact Assessment. We do not wish to comment on the other questions in the consultation document.

Question 9: Do you agree that article 1(5) land and Sites of Special Scientific Interest should be excluded from the changes to permitted development rights for homeowners, offices, shops, professional/financial services establishments and industrial premises?

Yes, the extension of any building in a National Park needs to take account of the statutory National Park purpose to conserve and protect the special qualities of the area. It is essential that National Park Authorities (NPAs) continue to have the

opportunity to monitor and manage such changes to ensure that the potential impacts are properly considered and that due account is taken of the cumulative impacts within an area. NPAs will only be able to do this if planning permission is required. We therefore support the proposal to exclude article 1(5) land from the changes to permitted development rights.

Question 10: Do you agree that the prior approval requirement for the installation, alteration or replacement of any fixed electronic communications equipment should be removed in relation to article 1(5) land for a period of five years?

No, we do not support the proposal to remove the prior approval requirement for fixed electronic communications equipment in relation to article 1 (5) land, as we do not believe it is necessary and could have unintended consequences. It also sets a dangerous precedent and will lead to increased pressure for the relaxation of other planning regulations in protected landscapes.

The Campaign for National Parks recognises the importance of providing faster broadband in rural areas but believes that this is best done in a planned and co-ordinated way which takes account of the special status of all designated landscapes. We are concerned that this proposal could have a negative impact on economic growth if it leads to a proliferation of overhead lines and other intrusive telecommunications infrastructure in National Parks. The local economy in many National Parks relies heavily on tourism and many visitors are specifically attracted by the wildness and beauty of these areas.

There is no evidence that the additional protection afforded designated landscapes has acted as a barrier to rural growth or delayed the roll-out of broadband. In fact there are good examples of NPAs working with telecommunications providers and other stakeholders to ensure that broadband and mobile phone coverage is improved with as little visual impact on National Parks as possible. We would be happy to provide further information about these examples if required.

It is essential that a planned and co-ordinated approach can be used to deliver future telecommunications networks in National Parks. This will ensure that the amount of infrastructure required can be minimised (for example, by considering whether there are opportunities to share poles and masts) and placed in the most appropriate location. However, this will only happen if the prior approval requirement remains and NPAs can continue to work with providers to ensure that National Park purposes are taken into account in the provision of telecommunications infrastructure.

The fact that the exemption would be granted for a limited period also means that developers will rush to deliver the cheapest, fastest solutions rather than working with NPAs and others to deliver well designed solutions which are appropriate to designated landscapes.

We also believe that this proposal is inconsistent with paragraph 115 of the National Planning Policy Framework which states that 'Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to

landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.'

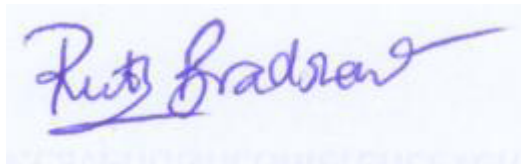
Do you have any comments on the assumptions and analysis set out in the consultation stage Impact Assessment? (See Annex 1)

Yes. The impact assessment explains the benefits of superfast broadband ('Rural proofing', p30), but does not say anything about the environmental costs. This is all the more strange given the comments in the preceding paragraph which justify why householder and business extensions will not apply in protected areas: 'There is a need to strike an appropriate balance between deregulating and maintaining appropriate protections, particularly in those sensitive areas where tighter controls are needed as development can have a disproportionate impact on the quality and character of the natural and built landscape.'

We are particularly concerned that this indicates that the proposed policy is based on a biased, rather than an impartial evidence base.

We have already met CLG officials to discuss the related proposals in the Growth and Infrastructure Bill. If it would be helpful, we would be happy to meet to discuss our concerns about the changes proposed in this consultation and to demonstrate why these changes are not needed.

Yours sincerely



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