

Submitted by email to: [VHTR@dcms.gov.uk](mailto:VHTR@dcms.gov.uk)

**Improving connectivity for very hard to reach premises  
A submission of evidence from the Campaign for National Parks**

1. 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. We have been campaigning for 80 years to ensure that our National Parks are beautiful, inspirational places that are relevant, valued and protected for all.
2. Our evidence is relevant to C15: How do you consider 'Protected Landscapes' (for example, National Parks, AONB) when making your investment decisions?
3. Campaign for National Parks fully supports the provision of improved connectivity in rural areas. However, it is essential that any measures to increase provision for very hard to reach premises in protected landscapes take full account of the need to ensure that every effort is made to reduce the visual and landscape impacts of new infrastructure in such areas.
4. Anything which makes National Parks less attractive places to visit could actually have a negative impact on the rural economy so every effort should be taken to avoid a proliferation of overhead infrastructure in National Parks. The local economy of these areas often relies heavily on tourism and many visitors are specifically attracted by wildness and natural beauty, particularly in the kind of locations where very hard to reach premises are likely to be located. In 2016, there were 94 million visitors to National Parks and surrounding areas in England who spent more than £5 billion and supported 75,000 jobs<sup>1</sup> and around a third of total employment in National Parks is supported by tourism<sup>2</sup>.
5. Some of our local partners have raised concerns about the proliferation of poles and wires being installed in National Parks in order to provide superfast broadband to remote farms and hamlets. Objections to such proposals on the grounds of visual intrusion are often unsuccessful so there needs to be a stronger requirement on BT and other relevant companies to ensure that they are designing new broadband connections in the least visually intrusive way possible.
6. Without stronger requirements to reduce the impacts of their infrastructure, operators have no incentive to consider options which may be a little more difficult to implement. We have anecdotal evidence of a case where the BT design engineer agreed with a local resident that a less visually intrusive option could have been delivered, for example by siting some of the poles in a wooded area. In another example, a resident offered the use of a field for burying cables

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<sup>1</sup> [https://www.nationalparksengland.org.uk/data/assets/pdf\\_file/0015/1070313/INFOGRAPHIC-2017-hi-res.pdf](https://www.nationalparksengland.org.uk/data/assets/pdf_file/0015/1070313/INFOGRAPHIC-2017-hi-res.pdf)

<sup>2</sup> [https://www.nationalparksengland.org.uk/data/assets/pdf\\_file/0004/717637/Valuing-Englands-National-Parks-Final-Report-10-5-13.pdf](https://www.nationalparksengland.org.uk/data/assets/pdf_file/0004/717637/Valuing-Englands-National-Parks-Final-Report-10-5-13.pdf)

which the BT engineers agreed to, having not previously considered this option. It is essential that those designing new connections are fully aware of the additional protections which apply in National Parks and the options available for mitigating impacts in these areas.

7. It is also essential that a planned and co-ordinated approach is used to improving connectivity to very hard to reach premises. 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 appropriate planning controls are in place. Removing these risks delivering significant disbenefits, particularly in terms of the potential damage to protected landscapes and their settings.
8. National Park Authorities are already taking a proactive approach to ensuring that broadband infrastructure can be installed in a way which minimises the visual impacts. We are not aware of any evidence that the additional protection afforded designated landscapes has acted as a barrier to rural growth or delayed the roll-out of broadband.
9. We would also like to highlight that there is a willingness to pay for the removal of poles and the undergrounding of overhead lines in National Parks and AONBs, as demonstrated by what has been happening in the electricity industry for more than a decade now. For the current price control period for electricity distribution, RIIO-ED1 (2015-2023), Ofgem has agreed an allowance of just over £123m (in 2019/20 prices)<sup>3</sup> to be spent on the undergrounding of overhead electricity lines.
10. The allowance is based on Willingness to Pay (WTP) research and is paid for by consumers (through electricity bills). This process also demonstrates the strong desire for undergrounding by local communities in these areas as prioritisation is largely stakeholder-led with interest groups using surveys of local people to identify potential projects to underground.
11. The scheme for distribution lines has been running successfully since 2010 and there is now a similar scheme for electricity transmission lines for which Ofgem agreed an initial allowance of £500 million for the eight year price control period from April 2013. Ofgem has also confirmed that both allowances will be retained in the next price control periods.
12. Given the resources (in terms of both time and money) being put into undergrounding power lines, it would be more cost-effective to plan for broadband delivery in protected areas in a way that reduces the visual impacts from the outset, even if this results in higher costs initially. Installing broadband infrastructure as quickly and cheaply as possible would be a false economy and a waste of consumers' and tax-payers' money if further funding has to be generated at a later date to put these lines underground. It would also be a waste of the resources being put in to undergrounding power lines if the installation of

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[https://www.ofgem.gov.uk/system/files/docs/2020/07/ed2\\_ssmc\\_annex\\_1\\_delivering\\_value\\_for money\\_services\\_for\\_customers.pdf](https://www.ofgem.gov.uk/system/files/docs/2020/07/ed2_ssmc_annex_1_delivering_value_for_money_services_for_customers.pdf) (see Table 44)

broadband leads to an increase in new overhead lines in areas where power lines have been put underground in recent years.

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