

Wildlife and Countryside Link response to the consultation on extending permitted development rights

Wildlife and Countryside Link (Link) brings together 40 voluntary organisations concerned with the conservation and protection of wildlife, countryside and the marine environment. Our members practise and advocate environmentally sensitive land management, and encourage respect for and enjoyment of natural landscapes and features, the historic environment and biodiversity. Taken together our members have the support of over eight million people in the UK and manage over 750,000 hectares of land.

We have answered question 10 below, which relates to our concerns around the Growth and Infrastructure Bill, and have also provided some comments on the impact assessment. In addition, we would note that although we welcome the Government's recognition of the need to avoid additional impacts on protected landscapes from some proposed permitted development changes, there is a basic inconsistency between that and the proposed approach to telecommunications infrastructure.

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. Link recognises the importance of providing superfast broadband in rural areas, but believes that this must be done in a planned and coordinated way which takes into account the special status of all designated landscapes. This proposal is unnecessary, could have negative consequences for economic growth and sets a dangerous precedent for the importance of planning regulations in designated landscapes.

The proposal is unnecessary because there is no evidence that the protection afforded to designated landscapes is a barrier to rural growth or has delayed the roll-out of superfast broadband. The consultation paper itself does not justify the replacement of the current regulatory approach with a voluntary approach. In fact, there is good evidence that, for example, National Park Authorities have worked 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.

Furthermore, the proposal could have negative consequences for economic growth if it leads to a proliferation of intrusive infrastructure that damages the aesthetic value that draws people to visit designated areas. This could be exacerbated if the limited period of the exemption leads developers to deliver the fastest and cheapest solutions, rather than working with local planning authorities to deliver well-designed, appropriate solutions.

This proposal would set a dangerous precedent in removing prior approval for development in designated areas, that could lead to further degradation of these designated areas and their precious natural assets.

Finally, this proposal also runs contrary to the National Planning Policy Framework policy of giving 'great weight' to 'conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty.'¹

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 is silent on 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 maintain 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 significantly concerned that this indicates that the proposed policy is based on a biased, rather than an impartial evidence base.

This response is supported by the following ten organisations:

- Badger Trust
- Butterfly Conservation
- Campaign for National Parks
- Campaign to Protect Rural England
- Open Spaces Society
- Ramblers
- Royal Society for the Protection of Birds
- The Wildlife Trusts
- Wildfowl & Wetlands Trust
- Woodland Trust

**Wildlife and Countryside Link
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¹ DCLG (2012) *National Planning Policy Framework*, paragraph 115, p.26.