



The National Association for AONBs
Cymdeithas Genedlaethol AoHNE

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By email to jeanne.grey@bis.gsi.gov.uk

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Dear Ms Grey

Re: Broadband deployment and sharing other utilities' infrastructure

The English National Park Authorities Association (ENPAA) exists to support policy making through coordinating the views of the ten English National Park Authorities. It is governed by the Chairs of the ten Authorities. This response represents the collective view of officers who are working within the policies established by the National Park Authorities (NPAs).

The network of AONBs cover nearly 8000 square miles of some of the finest countryside in England, Wales and Northern Ireland. AONBs are strategic national assets managing and directing positive landscape change through active partnership working. AONBs find local solutions to protect nationally important areas facing the impact of global issues.

The National Association for Areas of Outstanding Natural Beauty (NAAONB) is a voluntary body whose membership includes all the AONB Partnerships in England and Wales, as well as many of the local authorities with statutory responsibility for AONBs, the Trust which manage AONBs in Northern Ireland, as well as a number of voluntary bodies and individuals with an interest in the future of these iconic landscapes.

ENPAA and NAAONB welcome the Government's consultation on broadband deployment and sharing other utilities' infrastructure. National Parks and AONBs cover approximately 25% of England by land area, and National Parks are home to some 332,900 people. These are overwhelmingly rural communities, which often struggle to access the broadband speeds enjoyed by those in more urban areas. This can have direct economic consequences, for example for tourism businesses that are unable to promote themselves to the growing number of people booking holidays online. A 2009 survey in Northumberland identified that the vast majority of rural businesses rely on broadband, but only 54% of those in the Northumberland uplands found it was adequate for their future needs. A household survey of residents in Northumberland National Park found an even lower percentage of 28% felt their connection would be adequate for the future.

(continued overleaf)

English National Park Authorities Association

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The current *English National Parks and the Broads UK Government Vision and Circular (2010)* explicitly addresses the need to encourage communications infrastructure in National Parks. National Park Authorities have a duty under the *National Parks and Access to the Countryside Act (1949)* 'to seek to foster the economic and social well-being of local communities within the National Park'. It is clear that thriving communities require communications infrastructure that will be fit for purpose, in order to support diverse and balanced economic activity, attract investment, and provide high value, knowledge-intensive jobs.

ENPAA and NAAONB see effective roll out of superfast broadband as key to the future prosperity of rural communities, and shared infrastructure has the potential to minimise adverse landscape impacts in protected landscapes such as National Parks and AONBs. Where possible, we would hope to see broadband deployment achieved through the sharing of existing infrastructure such as BT's ducts and poles; other telecommunications infrastructure; and other utilities infrastructure.

The consultation document refers to the potential for new overhead telecommunications cables to provide a cost effective contribution to the roll out of next generation access, particularly in rural areas. It also points to relaxation of the Electronics Communications Code as a means to achieve this. In line with the National Parks Circular and current planning policy we would anticipate a more measured approach to implementation of this policy in National Parks. New overhead cables have significant potential impacts in landscape terms, and National Parks are designated as nationally important landscape areas. Therefore any relaxation of the Code should maintain appropriate protection for landscape in National Parks. We look forward to receiving further details of the consultation on proposed changes to the Code later in the year. ENPAA fully supports the emphasis given in the discussion paper to consulting local communities regarding impacts on visual amenity versus the benefits of greater connectivity.

The Association of National Park Authorities and NAAONB hold a joint accord with the Mobile Operators Association. This seeks to protect the special qualities of the protected landscapes while making the best possible provision for telecommunication services. We would suggest that the principles of this accord could be equally applicable to the provision of broadband infrastructure.

Mobile operators provide copies of their roll out plans to National Park Authorities, to enable discussions about their proposals at an early stage. The operators' acquisition agents/planning consultants also initiate pre-application discussions with the National Park Authority prior to the submission of any application for telecommunications development within or immediately adjacent to a National Park. This enables positive discussions to take place to explore the optimum environmental and network solution. Discussions seek to mitigate adverse landscape impacts, and include consideration of infrastructure sharing, technical solutions, landscaping and design issues. ENPAA and NAAONB would like to see Government encourage broadband companies to enter into similar discussions with National Park Authorities and AONBs regarding broadband roll out plans in and adjacent to National Parks and AONBs. This would be in line with the commitment in the National Parks Circular that 'the Government and Ofcom will encourage early consultation on the part of the operators with the Authorities on proposals that might affect a Park'.

The consultation document seeks views on the benefits for utility infrastructure owners in making their infrastructure available for sharing. Section 11A(1) of the *National Parks and Access to the Countryside Act (1949)* as amended by *Section 62(2) of the Environment Act (1995)* requires that 'in exercising or performing any functions in relation to, or so as to affect land' within National Parks, a 'relevant authority shall have regard to' their statutory purposes of designation. The same duty applies in AONBs under Section 85 of the *Countryside and Rights of Way Act 2000*. Making infrastructure in National Parks and AONBs available for sharing would provide a very positive way for infrastructure owners to demonstrate implementation of this duty.

There have been successful projects in or near National Parks that have used different delivery vehicles to roll out broadband in rural areas where there is a lack of existing infrastructure and no plans for BT to improve the network. One example is the Northlew Broadband Project near Dartmoor National Park, which attracted half of its funding through the Greater Dartmoor Local

Enterprise Action Fund (a project assisted through funding under the RDPE Local Action for Rural Communities initiative). A 34 Mb/s line leased from BT was installed, with access points for wi-fi connectivity throughout the village and subscriber units at each registered address. The network, revenue collection and security is managed by Cybermoor, an already established and successful Community Broadband Company. The original project also included the provision of broadband to Belstone, a small community within the National Park. This was subsequently not needed as BT agreed to provide a service.

Another example is a project in Northumberland funded through the Northumberland Uplands Local Action Group, a legal company funded by RDPE. This is rolling out a programme to enable 1,800 (or 80%) of businesses and households in 'not-spots' in Northumberland to connect to a reliable broadband service. The project will provide at least one high speed exemplar in one of the rural market towns on the edge of the National Park. There will also be two high profile tourism specific wi-fi areas around the most heavily visited sites in the National Park.

Additionally to the points on infrastructure sharing, ENPAA hopes to see state aid issues that currently affect the roll out of broadband addressed. Public authorities have been able to invest in superfast networks in rural areas for their offices, schools and libraries. Under present arrangements these networks cannot be made available to private or domestic customers, who can be left behind in the 'not spots'. It would be helpful to find a way to give access to these customers, to avoid a 'digital divide' and support local businesses.

The issues faced by communities living and working within Areas of Outstanding Natural Beauty are similar to those faced by those in National Parks, not only in relation to the need for good communication networks but also with regards the potential impact of changes to infrastructure.

We are happy for this response to be made publicly available and would be happy to discuss any of the points we make further with officials if that would be helpful.

Yours sincerely



Meriel Martin
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English National Park Authorities Association