



Historic England

## Historic England Response to the Call for Evidence for the Review of How the Planning System in England Can Support the Delivery of Mobile Connectivity

### The operation of the Code of Best Practice

[6.3] Historic England's impression of the existing Code of Practice is that, in broad terms, it is operating satisfactorily. Its operation would however be improved by a greater emphasis on engagement with Historic England and other relevant statutory agencies (e.g. through the inclusion of an obligation on local planning authorities (LPAs) that they should alert the operator to the desirability of pre-application engagement, and, then, when the application has been made, for LPAs to consult promptly so that statutory agencies can respond within the normal 21 days).

### The benefits and impacts for communities of coverage and the effect of infrastructure on the landscape

[8.6] Historic England recognises and supports the importance of mobile connectivity in promoting productivity and growth, as well as the importance of safeguarding protected areas, and believes that the existing balance between the two is broadly appropriate (for the purposes of this response, 'protected area' is assumed to include all Article 2(3) land, i.e. including World Heritage Sites and Conservation Areas). Permitted development rights for masts in protected areas would disturb this balance, and adversely affect protected areas. A strong case would need to be made in support of such a change, and Historic England is not aware of any evidence that would justify it. In contrast, the existing systems work well, and ensure that proposed masts are appropriately considered 'in the round', i.e. with landscape, heritage and other impacts weighed against the public benefit within the context of national and local policy.

[8.7] Improvements to mast design and mitigation would further reduce the impact of masts within the wider landscape; such improvements might not be forthcoming if masts were given permitted development rights. We would be happy to engage with operators regarding improvements to mast design and mitigation.

### The projected impact of technology on future mobile infrastructure requirements

[9.3] Time-limited approvals that reflected the rapid changes in this field would seem to encourage the replacement of outmoded infrastructure with smaller/better designed technology – which would, in turn, reduce impact.

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