

Reforming planning rules to accelerate deployment of digital infrastructure ¹

Temporary redeployment after a Notice-to-Quit (NTQ)

Questions (1 to 4)

We are seeking views on extending the permitted period for temporary relocation of apparatus following a landowner NTQ. The current limit for emergency use is 18 months as set out in the GPDO. We would welcome views and evidence on:

Question 1: How appropriate is the current limit of 18 months for the emergency period to temporarily deploy infrastructure without planning permission?

Multiple choice answers:

- It's too short
- It's of an appropriate length
- It's too long
- I'm unsure
- **I have no opinion**

Question 1a: Please explain the reason for your answer, including any effect of 18-month the limit for you or your organisation (for example in terms of administrative processes, costs, resourcing, timelines, engagement with local residents or any other effects).

No comment.

Question 2: What would be the most appropriate limit for the emergency period?

Multiple choice answers:

- 18 months (current limit)
- 24 months
- 36 months
- Other, please explain
- I'm unsure
- **I have no opinion**

Question 2a: Please explain the reason for your answer, including any effect of retaining or changing the current limit for you or your organisation (for example in terms of

¹ <https://www.gov.uk/government/calls-for-evidence/reforming-planning-rules-to-accelerate-deployment-of-digital-infrastructure/reforming-planning-rules-to-accelerate-deployment-of-digital-infrastructure>

administrative processes, costs, resourcing, timelines, engagement with local residents, or any other effects).

No comment.

Question 3: How do you think extending the 18-month limit would affect each of the following?

Separate open text box on:

- Coverage and restoration of coverage following site loss
- Amenity
- Noise
- Local authority workload

- **Is there anything else you think would be affected if the limit is extended?**

There is a risk that extending the time limits will prolong and compound any potentially harmful impacts to the historic environment brought about by temporary relocation such as interruption of key views or addition of overbearing modern utilitarian structures to a streetscape, townscape or landscape. It is important to understand the connotations and potential impacts of temporary siting ahead of it taking place. This could include, for example, collaboration between operators, local planning authorities and bodies such as Historic England to explore and identify contingency sites before they are needed.

Question 4: Please describe any safeguards or conditions you believe should be applied to any extension of the limit and explain why you think they are important.

Historic England appreciate that there is likely to be a greater need for expediency in circumstances where a temporary redeployment is needed. Given this reduced capacity to consider issues such as design and other mitigations through a planning or prior approval process, it would be appropriate to exempt article 2(3) land, Scheduled Monuments, Registered Parks and Gardens, Registered Battlefields, as well as Listed Buildings and their curtilage from the extension of the time limit. This would avoid prolonged impact on these assets and account for the need for associated consents such as scheduled monument consent and listed building consent, which would evidently add time to the process.

The suggested change above would not be sufficient to mitigate all potential impacts to the historic environment, such as on the significance of heritage assets through development in their setting and archaeological remains, however. It is recommended that the Code of Practice for wireless operators, which has an explicit emphasis on collaboration between operators and local planning authorities, is updated to encourage the identification of contingency sites prior to them being needed, allowing consideration of heritage, including impacts on archaeological remains, in a timely manner.

Larger rooftop infrastructure on protected land and unprotected land

Questions (5 to 8)

We are seeking views and evidence on expanding permitted developments rights to allow additional rooftop apparatus in protected land including moving certain developments from prior approval to prior notification and increasing the current allowance of 3 antennas where appropriate. We would welcome views and evidence on:

Question 5: How do the current rules requiring a prior-approval process or a full planning application for larger rooftop infrastructure affect you or your organisation (for example in terms of administrative processes, costs, resourcing, timelines, engagement with local residents, or any other effects)?

No comment.

Question 5a: Should specified rooftop apparatus on protected land that can currently be deployed under prior approval move to prior notification?

Multiple choice:

- Yes
- **No**
- I'm unsure
- I have no opinion

Question 5b: Please explain the reason for your answer, including any effect of the move from prior approval to prior notification for you or your organisation (for example in terms of costs, resourcing, timelines, engagement with local residents, or any other effects).

The Code of Practice for wireless operators is clear that the government's ambition is to deliver high-quality digital infrastructure in balance with environmental considerations (paragraph 2). This is to be delivered sustainably through the planning system (paragraph 13) with collaboration between operators, local planning authorities and other stakeholders (paragraph 18). Whilst it has its limitations, this collaboration is currently assured through the prior approval process with an explicit consideration of design and siting matters. Impacts on the historic environment, including through considerations such as design and siting, are by their nature qualitative. By contrast, prior notification is not sufficient to enable adequate consideration of these issues because it is appropriate only for quantitative or binary matters.

Historic England understands the need for greater clarity to support operators deliver effectively. Building on the principles in the Code of Practice for wireless operators, however, this can be facilitated through engagement and collaboration between operators and Local

Planning Authorities. This can be done informally or utilising formal frameworks and processes that clarify expectations and standards. For example, conservation area appraisals and management plans can identify areas or buildings suitable (and unsuitable) for telecoms development and set design standards. The Code of Practice for wireless operators already places emphasis on the importance of local design policy and frameworks such as design coding in the process.

Question 6: What do you think is an appropriate limit on the number of antennas per rooftop mast on protected land?

Multiple choice:

- 3 (current limit)
- 4
- 5
- 6
- Other, please specify
- I'm unsure
- I have no opinion

Question 6a: Please explain the reason for your answer, including any effect of retaining or changing the current limit for you or your organisation (for example in terms of administrative processes, costs, resourcing, timelines, engagement with local residents, or any other effects).

Any expansion of the number of antennas through this right is potentially of concern, as it could exacerbate the impact of infrastructure on the historic environment including piecemeal and cumulative erosion of a historic streetscape, townscape, skyline, or landscape. However, there are instances where allowing greater and more concentrated numbers might be appropriate and beneficial, for example to encourage site sharing and reuse of existing infrastructure such as support masts (as outlined in the Code of Practice for wireless operators) which could limit cumulative harm and / or enable more discrete siting.

Similarly, the National Planning Policy Framework (paragraph 207) and Planning Practice Guidance (Historic Environment paragraph 018) are clear that it is the impact on heritage significance rather than the scale (e.g. quantum) of development that is the critical factor. As such, it is difficult to assign a default numerical threshold – a comparatively small development could have a greater impact on significance than a larger one, for example, if the site is within an historic area or could impact on the significance of heritage assets that are particularly sensitive to change.

Emphasis should instead be on assuring collaboration between providers and Local Planning Authorities to identify appropriate locations and, informed by adequate, clear evidence, design measures as secured through the plan-making, planning or prior approval processes.

Question 6b: If the current limit of 3 antennas was to be increased in protected areas, what design or heritage safeguards do you believe should be in place?

It is critical to maintain the prior approval process. This should maintain existing matters and conditions, including design and siting, and be expanded to include explicit reference to heritage as a prior approval matter, to ensure the impacts on the historic environment can be considered holistically.

Question 7: What evidence is there on coverage benefits and visual impacts in protected areas?

Rooftop infrastructure has the potential, particularly if installed in a piecemeal and cumulative fashion without regard to overarching standards, to impact the significance of heritage assets, including through development in their setting. This includes, for example, interrupting the visual coherence of a roofscape or streetscape through bolt-on elements, and through their utilitarian design and form undermine the architectural quality of buildings, the quality of views to landmarks and / or landscape backdrop (especially designed views), and the overarching quality, coherence and appreciation of a valued skyline (e.g. the spires of Oxford). Historic England's published advice on setting highlights a range of considerations of relevance including, for example, potential intrusions on views, whether development competes with, distracts from or diminishes the prominence of heritage assets in key views, and whether cumulative developments alter appreciation of vistas.

Question 7a: Should the current maximum height limit for rooftop masts (6m above the highest part of the building) be increased to 8m to accommodate new technologies such as 5G?

Multiple choice:

- Yes
- No
- I'm unsure
- I have no opinion

Question 7b: Please explain the reason for your answer, including any effect of increasing the height limit for you or your organisation (for example in terms of coverage benefits, costs, resourcing, timelines, engagement with local residents, or any other effects).

Any expansion of the right is potentially of concern, as it could exacerbate the impact of infrastructure on the historic environment, including enabling larger and more visually dominant structures on a street, roof or townscape. However, there are instances where allowing greater height might be appropriate, for example if larger support structures allow greater site sharing whilst meeting capacity requirements, limiting cumulative harm or enabling more discrete siting.

Similarly, the National Planning Policy Framework (paragraph 207) and Planning Practice Guidance (Historic Environment paragraph 018) are clear that it is the impact on heritage significance rather than the scale (e.g. quantum) of development that is the critical factor. As such, it is difficult to assign a default numerical threshold – a comparatively small development could have a greater impact on significance than a larger one, for example, if the site is within an historic area or could impact on the significance of heritage assets that are particularly sensitive to change.

Emphasis should instead be on assuring collaboration between providers and Local Planning Authorities to identify appropriate locations and, informed by adequate, clear evidence, design measures as secured through the planning or prior approval processes.

Question 7c: If the height limit was increased, what design or heritage safeguards do you believe should be in place?

It is critical to maintain the prior approval process. This should maintain existing prior approval matters and conditions, including design and siting, and be expanded to include explicit reference to heritage as a prior approval matter to ensure the impacts on the historic environment can be considered holistically.

Question 8: Are there other barriers to the deployment of digital infrastructure on rooftops on unprotected land, noting the current restriction of 6m in height for rooftop masts?

No comment.

Ground-based monopoles in non-designated land

Questions (9 to 12)

We are seeking views on allowing ground-based monopoles up to 20m as permitted development in non-designated areas subject to prior notification (not prior approval) as-well-as inviting views on whether existing height restrictions on other types of ground-based masts should be changed.

We would welcome views and evidence on:

Question 9: How do the current rules requiring a prior-approval process to deploy a monopole up to 20 metres affect you or your organisation (for example in terms of costs, resourcing, timelines, engagement with local residents, or any other effects)?

No comment.

Question 9a: Should monopoles up to 20 metres be allowed in unprotected areas under prior notification?

Multiple choice:

- Yes
- **No**
- I'm unsure
- I have no opinion

Question 9b: Please explain the reason for your answer, including any effect of this change for you or your organisation (for example in terms of costs, resourcing, timelines, engagement with local residents, or any other effects).

Development in 'un-protected areas' (e.g. outside Article 2(3) land) nonetheless has capacity to impact the historic environment. For ground-based infrastructure this could also include archaeological impacts, from structures and associated cabling, including both designated sites (e.g. scheduled monuments) and those of national importance but not scheduled (NPPF footnote 75).

Of particular importance in this instance is setting, which contributes to or enables appreciation of the significance of heritage assets. The existing right does provide some means to address issues of setting. Condition A.2(c) states that that any development 'visible from' a range of assets, including Registered Parks and Gardens for example, should seek to limit the visual impact of development on that site. Whilst visibility and views are only one aspect of setting, this is nonetheless an important foundation.

The Code of Practice for wireless operators is clear that the government's ambition is to deliver high-quality digital infrastructure in balance with environmental considerations (paragraph 2). This is to be delivered sustainably through the planning system (paragraph 13) with collaboration between operators, local planning authorities and other stakeholders (paragraph 18). Whilst it has its limitations, this collaboration is currently assured through the prior approval process with an explicit consideration of design and siting matters. Impacts on the historic environment, including through considerations such as design and siting, are by their nature qualitative. By contrast, prior notification is not sufficient to enable adequate consideration of these issues because it is appropriate only for quantitative or binary matters.

Historic England understands the need for greater clarity to support operators delivering effectively. Building on the principles in the Code of Practice for wireless operators, however, this can be facilitated through engagement and collaboration between operators and Local Planning Authorities. This can be done informally or utilising formal frameworks and processes that clarify expectations and standards. For example, conservation area appraisals and management plans can identify areas or buildings suitable (or unsuitable) for telecoms development and set design standards. The code already places emphasis on the importance of local design policy and frameworks such as design coding in the process.

Question 9c: If 20 metres monopoles were allowed under prior notification, what would be the effect on areas with local wireless capacity issues?

No comment.

Question 10: Should the existing height limit for ground-based masts (excluding monopoles) in unprotected areas be increased from 25 metres to 30 metres, changing the approval process from prior approval to prior notification?

Multiple choice:

- Yes
- **No**
- I'm unsure
- I have no opinion

Question 10a: Please explain the reason for your answer, including any effect of this change for you or your organisation (for example in terms of costs, resourcing, timelines, engagement with local residents, or any other effects).

In terms of the size threshold, any expansion of the right could be of concern, allowing larger and more visually dominant monopoles in, for example, the setting of heritage assets. However, there might be instances where this is appropriate, for example if larger poles allow greater sharing of infrastructure to allow more discrete siting and control over proliferation and cumulative change. Similarly, the National Planning Policy Framework (paragraph 207) and Planning Practice Guidance (Historic Environment paragraph 018) are clear that it is the impact on heritage significance rather than the scale of development that is the critical factor.

As such, it is difficult to assign a default numerical threshold. Emphasis should instead be on assuring collaboration between providers and Local Planning Authorities to identify appropriate locations and, informed by adequate, clear evidence, design measures as secured through the plan-making, planning or prior approval processes.

The Code of Practice for wireless operators is clear that the government's ambition is to deliver high-quality digital infrastructure in balance with environmental considerations (paragraph 2). This is to be delivered sustainably through the planning system (paragraph 13) with collaboration between operators, local planning authorities and other stakeholders (paragraph 18). Whilst it has its limitations, this collaboration is currently assured through the prior approval process with an explicit consideration of design and siting matters. Impacts on the historic environment, including through considerations such as design and siting, are by their nature qualitative. By contrast, prior notification is not sufficient to enable adequate consideration of these issues because it is appropriate only for quantitative or binary matters.

Historic England understands the need for greater clarity to support operators deliver effectively. Building on the principles in the Code of Practice for wireless operators, however, this can be facilitated through engagement and collaboration between operators and Local Planning Authorities. This can be done informally or utilising formal frameworks and processes that clarify expectations and standards. For example, conservation area appraisals and management plans can identify areas or buildings suitable (or unsuitable) for telecoms development and set design standards. The code already places emphasis on the importance of local design policy and frameworks such as design coding in the process.

Question 10b: If the height limit was increased, what would be the effect on local coverage and the timescale of the network upgrades required for 5GSA?

No comment.

Question 11: Should the existing height limit for ground-based masts (excluding monopoles) in protected areas and on highway land be increased from 20 metres to 25 metres allowed under prior approval?

Multiple choice:

- Yes
- **No**
- I'm unsure
- I have no opinion

Question 11a: Please explain the reason for your answer, including any effect of this change for you or your organization (for example in terms of costs, resourcing, timelines, engagement with local residents, or any other effects).

Any expansion of the right is potentially of concern, as it could exacerbate the impact of infrastructure on the historic environment, including enabling larger and more visually dominant

structures on a street, roof or townscape. However, there are instances where allowing greater height might be appropriate, for example if larger support structures allow greater site sharing whilst meeting capacity requirements, limiting cumulative harm.

However, proximity to highway land is a particular factor here. Across the GDPO, proximity to highway land is used as a factor to limit or lessen potential impacts on conservation areas – given visibility from a highway is likely to be critical to public appreciation of the area’s character and appearance. It is also likely to limit the opportunity for discrete siting. As such, Historic England consider there is a particular risk in expanding the height limit for ground-based masts on highway land under this right.

Question 11b: If the height limit was increased, what would be the effect on local coverage and the timescale of the network upgrades required for 5GSA?

No comment.

Question 12: If government proceeds with any of the proposed changes outlined in the previous questions, what specific mitigations should be required to manage impacts on visual amenity, heritage and environmental sensitivities?

The existing rights include prior approval for design and siting as well as conditions for removal and remediation of land etc – these should remain. The impact of development on ‘heritage, including archaeology’ should be added as a prior approval matter to enable holistic consideration of the impact on heritage assets, with impacts on buried archaeological remains a particularly key current omission for ground-based apparatus. An example of this in the GDPO can be seen in Schedule 2, Part 20, Class ZA.

Small cell systems and restrictions on size

Questions (13 to 15)

We are seeking views on updating size parameters and definitions for small cell systems so that equipment can support multiple operators and newer 5G equipment within clear, consistent limits. We are interested in proposals to align the treatment of “small antennas” and “small cell systems” and in evidence on visual and street clutter impacts.

We would welcome views and evidence on:

Question 13: To what extent, if at all, do restrictions on small cells affect you or your organisation? Please provide details of this (for example, in terms of deployment timelines, costs, hosting operator equipment etc.)

No comment

Question 14: What changes to small cell systems’ definitions and or size limits would support multi-operator equipment and 5G while helping to manage and minimise street clutter?

Small-cell systems can be mounted on street furniture. As such, they can have a significant and potentially harmful impact on the character and appearance of historic areas (e.g. article

2(3) land). This includes potential mounting on historic street furniture itself and more broadly create visual clutter across a streetscape. This is not tied explicitly to a size threshold, as units of any size could potentially cause harm, particularly if done in a piecemeal and haphazard fashion without due regard to the nature of the local context as well as any associated standards (e.g. coding) for public realm and street furniture in the local vicinity.

Question 15: What conditions or limitations do you believe would be proportionate in this context? Please describe any conditions or limitations (for example on mounting locations, cabling, power, maintenance access) and explain why they would be proportionate.

Heritage, siting and design should be prior approval matters for small-cell systems. Design issues to consider will include the use of recessive / matching colours, limiting the proximity between units sited on different supports (e.g. lampposts) to avoid cumulative clutter, and ensuring prompt removal and remediation when no longer in use.

Tools such as conservation area appraisals and management plans as well as design codes and guides could provide clarity over where such infrastructure is and is not appropriate, for example identifying historic or high-quality modern areas of public realm and street furniture where it would be particularly harmful to install (such as a historic market square, abbey precinct, areas of significant modern public realm investment etc) and associated standards.

Review of Part 16 of Schedule 2 to the GPDO

Questions (16 to 19)

We would welcome views and evidence on:

Question 16: How clear are the current Part 16 rules?

- Very clear
- Clear
- Neither clear nor unclear
- Unclear
- Very unclear
- I'm unsure
- I have no opinion

Question 16a: Please provide evidence for your answer.

No comment.

Question 17: How consistently are the Part 16 rules applied and/or interpreted across local authorities in England?

Multiple choice:

- Completely consistent
- Mostly consistent
- Somewhat inconsistent
- Very inconsistent
- I'm unsure
- I have no opinion

Question 17a: Please provide evidence for your answer.

No comment.

Question 17b: If you feel the current rules are not applied consistently, how does this affect you or your organisation (for example, in terms of the outcome of planning applications)?

No comment.

Question 17c: Please describe how previous legislative changes to Part 16 have affected you or your organisation's ability to interpret or implement the rules. Please

provide examples of challenges, delays or any other impacts on you or your organisation.

No comment.

Question 18: Do you think a full review of the Part 16 rules would help improve their clarity?

Multiple choice:

- Yes
- No
- I'm unsure
- **I have no opinion**

Question 18a: Please provide evidence for your answer.

No comment.

Question 18b: Beyond those referenced elsewhere, which targeted reforms to Part 16 would provide greater clarity to local planning officers?

Broadly speaking, Part 16 has several welcome exemptions and conditions that seek to balance infrastructure delivery with environmental considerations including, for example:

- *The prevalence of design and siting as a prior approval matter.*
- *Exemptions for scheduled monuments and listed buildings.*
- *Condition A.2(c) seeking to limiting the impact of sites 'visible from' a range of designated heritage assets.*

On the latter, the setting of heritage assets is a primary consideration and is often overlooked in permitted development terms. Whilst views are one component of setting, this provision is nonetheless highly welcome in enabling some consideration.

However, it is recommended that any review of Part 16 looks to ensure consistency across its parts in relation to the historic environment and to ensure appropriate issues are considered, including:

- *Explicit reference to heritage including impacts on buried archaeological remains as a prior approval matter. Archaeology is a prominent current omission for ground-based infrastructure.*
- *All exemptions for listed buildings should also include their curtilage, particularly accounting for ground-based apparatus.*
- *To ensure clarity, condition A.2(c) could be amended to remove specific reference to World Heritage Sites, since they are encompassed in Article 2(3) Land, and the erroneous term 'schedule' monument should be corrected to 'scheduled monument'.*

Question 19: Do you think a full review of Part 16 would support 5G standalone rollout?

Multiple choice:

- Yes
- No
- I'm unsure
- I have no opinion

Question 19a: Please provide evidence for your answer.

No comment.

Fibre Exchanges

Questions (20 to 23)

We seek views on moving fibre exchange structures into permitted development subject to conditions. We invite evidence on typical footprints, siting considerations, cumulative impacts and any safeguards that may be required.

We would welcome views and evidence on:

Question 20: How do the current rules regarding FEx sites affect you or your organisation (for example in terms of administrative processes, costs, resourcing, timelines, or any other effects)?

No comment.

Question 21: Do you think certain fibre exchange structures should be allowed as permitted development?

Multiple choice:

- Yes
- No
- I'm unsure
- I have no opinion

Question 21a: Please explain the reason for your answer, including any effect of this change for you or your organisation (for example in terms of administrative processes, costs, resourcing, timelines, engagement with local residents, or any other effects)

The creation of a permitted development right for fibre exchange structures is a risk, given that it provides planning permission and accepts the principle of development before local planning authorities can consider and balance key considerations. It is critical to ensure local planning authorities have the appropriate opportunity to work collaboratively with operators to identify sites and explore design issues as is central to the Code of Practice for wireless operators.

Question 22: If you think they should be allowed, what dimensional thresholds or conditions would be appropriate?

In terms of the size threshold, the National Planning Policy Framework (paragraph 207) and Planning Practice Guidance (Historic Environment paragraph 018) are clear that it is the impact on heritage significance rather than the scale of development that is the critical factor. As such, it is difficult to assign a default numerical threshold. Instead, it is more important for any right to provide appropriate capacity for local planning authorities to consider and balance impact in any given situation through appropriate prior approval matters.

Question 23: What are the key planning considerations for local authorities when determining planning applications for FEx sites (for example noise, transport, flood risk, design)? For each consideration, please also suggest how it could be addressed.

The core considerations for the historic environment will include impact on the significance of heritage assets, including the contribution of their settings, ranging from impacts on the character and appearance of conservation areas to impacts on buried archaeological remains, through both structures and associated cabling. Exemption for designated assets would be preferable, enabling appropriate consideration through the planning process. However, as now, some key issues could be addressed to a degree through prior approval matters including design and siting (with addition of heritage, including archaeology) and with conditions relating to visibility and the removal of infrastructure when defunct.

Updating the Wireless Code of Practice

Questions (24 to 27)

We would welcome views and evidence on:

Question 24: How effective is the current Code of Practice in providing sufficient guidance for deploying network infrastructure?

Multiple choice:

- Very effective
- **Effective**
- Neither effective nor ineffective
- Ineffective
- Very ineffective
- I'm unsure
- I have no opinion

Question 24a: Please explain the reason for your answer and include any evidence, examples or recent experiences that support your view.

The Code of Practice is a highly useful and positive document. Of particular importance is the way in which it establishes a clear government ambition to deliver high-quality digital infrastructure in balance with environmental considerations (paragraph 2). This is, similarly, to be delivered sustainably through the planning system (paragraph 13) with collaboration between operators, local planning authorities and other stakeholders (paragraph 18). These foundational principles are critical for supporting growth through sustainable infrastructure. Beyond this, there are several key inclusions within the document that are welcomed, including:

- *Exploration of a range of design and siting mitigation measures, such as use of screening, 'camouflaged' colouring, considering impacts on valued views, vistas and sightlines (e.g. to landmarks), and advocating an approach that considers the reuse of existing infrastructure first and site sharing to address potential proliferation and accumulation of infrastructure.*
- *Advocating a spirit of collaboration and exploring mutual objectives including engagement with local planning authorities, communities and bodies including Historic England (all referenced explicitly).*
- *Emphasis on the importance of local plan design policies and frameworks including design codes.*

- *A section on the key policy considerations relating to the preservation and enhancement of heritage assets. This includes:*
 - *Specific reference to archaeological considerations, which is missing from the permitted development rights themselves.*
 - *Factors such as the need to consider the capability of older buildings to take structural loads from mounted equipment:*
 - *Explicit reference to the need to engage appropriate expertise.*

It is critical these elements remain, particularly the underlying principles of balancing delivery with environmental goals, as they ensure way the potential impacts of permitted development rights can be considered and addressed.

Question 25: Where the current Code is ineffective, what impact does it have on you/your organisation?

No Comment.

Question 26: In what areas could the Code of Practice be updated to reflect the latest developments in network rollout? Please provide specific examples and reasons.

As per the response to q.24a, the document is very positive. There are, however, minor areas in which it could be further developed that would support and enhance the clarity it provides to developers and local planning authorities further. This includes:

- *Paragraph 19 addresses principles for local planning authorities, including supporting operators in identifying sites. This might benefit from additional reference to the types of formal processes that could support this, and the development of clear standards, such as conservation area appraisal and management planning. This could explore key areas where these might be useful, including for example identifying appropriate areas / structures for infrastructure and / or specific coding for public realm changes.*
- *Paragraph 28 explores factors for consideration including views and visas. This might benefit from linking to Historic England advice that provides more specific information, specifically [Historic England Good Practice Advice in Planning Note 3: The Setting of Heritage Assets](#).*
- *Paragraph 34 refers to circumstances where scheduled monument consent would be required. This could helpfully be expanded to also refer to listed building consent (as per paragraph 62), and cross referenced to Historic England advice, specifically [Historic England Advice Note 16: Listed Building Consent](#).*
- *Paragraph 36 refers to issues surrounding trees. This could provide further information on related considerations including tree preservation orders and the additional controls on development impacting trees in conservation areas.*
- *Paragraph 31 makes a reference to the need to match surrounding street furniture in the colouring of cabinets, and paragraph 32 makes broader reference to resources that guide the siting of infrastructure in relation to safety etc (e.g. Manual for Streets). The impact of digital infrastructure on the public realm is a critical consideration, and this section would benefit from a specific link to Historic England's public realm guidance, [Streets for All](#), which would be invaluable in providing perspectives on specific considerations for the public realm in historic places.*

- *Paragraph 61 refers to the potential impact on archaeological deposits through laying of cables. This is welcome, and is a consideration missing from the rights themselves. However, the guidance would benefit from reference to archaeological impacts more broadly, e.g. from structures as well as cabling.*
- *Glossary: glossary definitions could be revised and expanded as follows:*
 - *Addition of a definition of ‘setting’, given how central this is to the guidance around siting and design, using that in the NPPF glossary.*
 - *Addition of a definition for non-designated heritage asset, as these are a material planning consideration, using [Historic Environment Planning Practice Guidance Paragraph 039](#).*
 - *The definition given in the glossary for listed buildings is not accurate and a little confusing, e.g. reference to ‘one of the four statutory lists’. It is recommended this is changed to ‘Listed buildings are buildings of special architectural or historic interest with legal protection. The record of each listed building is hosted on the National Heritage List for England’.*

Aside from specific links referenced above, it might be useful to include a bibliography of additional resources at the end of the document. This could helpfully signpost Historic England guidance on key matters including setting, listed building consent, archaeology and public realm. Historic England are happy to discuss this further and collate a list.

Question 27: Do you think it would be beneficial for the government to convene a working group to review the guidance.

- No
- Yes, on an ad hoc basis
- Yes, every 6 months
- Yes, every year
- Yes, every 2 years
- Other, please specify
- I’m unsure
- I have no opinion