mobile
operators
association

responsible
network
development

Planning Policy Manager,
Warwick District Council,
Riverside House,
Milverton Hill,
Leamington Spa
CV34 5QH

Date: 06 June 2014

Dear Sir/Madam

WARWICK DISTRICT COUNCIL - PRE-SUBMISSION DRAFT LOCAL PLAN 2011-2029 CONSULTATION

The Mobile Operators Association (MOA) represents the four UK mobile network operators – 3, Telefonica (O2), Everything, Everywhere (formerly Orange & T-Mobile) and Vodafone – on radio frequency health and safety and associated town planning issues.

The MOA has commissioned Mono Consultants Ltd to monitor all emerging development plan policies and supplementary planning guidance relating to telecommunications development on its behalf.

Please find attached a response to the current consultation documents prepared by Mono Consultants Ltd on behalf of the MOA.

Yours faithfully,

John Cooke
Executive Director

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Dear Sir/Madam

WARWICK DISTRICT COUNCIL - PRE-SUBMISSION DRAFT LOCAL PLAN 2011-2029 CONSULTATION

Thank you for your recent consultation on the above and taking the time to seek our views on the proposed Pre-Submission Local Plan. We welcome the opportunity to have input in the process.

We would take this opportunity to comment that we consider it important that there remains in place a telecommunications policy within the emerging Local Planning Framework. It is recognised that telecommunications plays a vital role in both the economic and social fabric of communities. National guidance recognises this through Section 5: "Supporting high quality communications infrastructure" of national Planning Policy Framework (March 2012) which provides clear guidance as to the main issues surrounding telecommunications development.

The National Planning Policy Framework (NPPF) at paragraph 42 confirms that *"advanced, high quality communications infrastructure is essential for sustainable economic growth and play a vital role in enhancing the provision of local community facilities and services. "* Paragraph 43 confirms that *"in preparing local plans, local planning authorities should support the expansion of telecommunications networks"*, but should also *"aim to keep the numbers of radio telecommunications masts and sites for such installations to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used, unless the need for a new site has been justified."*

Further advice on the siting and design of telecommunications and good practice procedural guidance is contained within the Code of Best Practice for Mobile Phone Network Development (July 2013). This builds on the Ten Commitments to ensure that the industry is alive to the concerns of local communities and consultation is built into the development process.

As indicated above the formulation of policy does not exist in isolation and there are numerous documents which will affect the formulation of any telecommunications policy, the most important of these being NPPF. On this basis we would suggest that within the Local Planning Framework there should be a concise and flexible telecommunications policy contained within one of the statutory Documents. Such a policy should give all stakeholders a clear indication of the issues which development will be assessed against. We would suggest a policy which reads;

"Proposals for telecommunications development will be permitted provided that the following criteria are met: -

> *(i)   the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area;*

> *(ii)   if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building;*

> *(iii)   if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority.*

(iv) ***If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest.***

When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology."

We would suggest that this policy be a stand alone policy within one of the main LDDs, with any back ground information, such as electromagnetic fields (EMFs) and public health, being contained within a separate Supplementary Planning Document. This could then be read with the guidance in NPPF and the Code of Best Practice to Mobile Phone Network Development to give a comprehensive background to any proposed development. We would consider it appropriate to introduce the policy and we would suggest the following;

"Modern telecommunications systems have grown rapidly in recent years with more than two thirds of the population now owning a mobile phone. Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With new services such as the advanced third generation (3G) services, demand for new telecommunications infrastructure is continuing to grow. The authority is keen to facilitate this expansion whilst at the same time minimising any environmental impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing and siting equipment on existing tall structures and buildings. Further information on telecommunications can be found in Local Development Document…………………"

In summary, we are suggesting that a clear and flexible telecommunications policy be introduced in one of the main LDDs. This should be introduced by a short paragraph outlining the development pressures and the authority's policy aims. We have suggested text for both above. In keeping with the aims and objectives of the legislation any background information should be contained within a separate non- statutory LDD which would not need to go through the same consultation process.

We trust you find the above comments of assistance. Please do not hesitate to contact me should you have any queries relating to the above matters.

Yours faithfully

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