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MONO CONSULTANTS LIMITED

20th November 2007

Our Ref: cw/dpm
 Your Ref: LDF/CS Issues & Options/MD

Dear Sir

GRAVESHAM LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY ISSUES AND OPTIONS CONSULTATION

We write to your planning authority on behalf of the Mobile Operators Association (MOA), which consists of: -

- Hutchison 3G UK Limited ("**3**"),
- O2 (UK) Limited ("**O₂**"),
- Orange PCS Limited ("**Orange**"),
- T-Mobile UK Limited ("**T-Mobile**"); and
- Vodafone Limited ("**Vodafone**").

The MOA monitors all emerging development plan policies and supplementary planning guidance that relate to telecommunications development and those which would have an impact on their member's agreements to supply a mobile telecommunications service in the UK. Mono Consultants undertake this project on behalf of the MOA.

As we wish only to comment on the emerging LDF as it relates to telecommunications development we have not completed the Representation Form which covers all issues & options for the Core Strategy.

It is recognised that telecommunications plays a vital role in both the economic and social fabric of communities. National guidance reinforces this through PPG8. For this reason we agree with and support the Council's preferred Option A as it relates to telecommunications (Spatial Objective 6), which states "*Encouragement will be given to the provision of an efficient telecommunications infrastructure and development which makes use of it across the Borough, in particular to ensure that all properties are connected to cable and telephone networks.*"

PPG8 gives clear guidance as to the main issues surrounding telecommunications development. These include the legislative framework, siting and design issues, levels of consultation and issues surrounding electromagnetic fields (EMFs). Clear guidance is also given regarding what should be included within local plan (now LDF) policy. This guidance states that local plans (LDDs) should set out criteria based policies to guide telecommunications development and that whilst regard should be had to siting and design considerations, operational efficiency should not be inhibited. PPG8 also makes clear that "*Criteria should be flexible enough to allow for the efficient development of the network and the demands imposed by the technology*".



Since the revision of PPG8 in 2001, the Office of the Deputy Prime Minister (ODPM) has produced, in conjunction with the industry, a Code of Best Practice. 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 PPG8. On this basis we would suggest that within the Local Development Framework there should be a concise and flexible telecommunications policy contained within one of the Council's statutory Local Development Documents. This 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.


It will of course depend on your Local Development Scheme as to which documents are produced, which documents have a statutory role in development control and which would be considered as material considerations. 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 LDD. This could then be read with PPG8, and the Code of Best Practice 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 Council are 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 location on existing tall structures and buildings. Further information on telecommunications can be found in Local Development Document.....

In summary, we recognise the early stage of LDFs and the early stage of the consultation process at which we are being asked for comment. 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 Councils policy aims. We have suggested text for both above. In keeping with the aims and objectives of the new legislation any background information should be contained within a separate LDD, such as a Supplementary Planning Document 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

A handwritten signature in black ink, appearing to read 'Carolyn Wilson', written in a cursive style.

Carolyn Wilson MRTPI
SENIOR PLANNER