The Development Plan Team
Angus Council
County Buildings
Market Street
Forfar
DD8 3LG

23 April 2015

Dear Sir or Madam,

ANGUS LOCAL DEVELOPMENT PLAN – PROPOSED PLAN 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 Limited 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 Limited on behalf of the MOA.

Yours faithfully,

John Cooke
Executive Director
Dear Sir or Madam

ANGUS LOCAL DEVELOPMENT PLAN – PROPOSED PLAN CONSULTATION

Thank you for your recent consultation on the above. We have considered the proposal relevant to the Mobile Operators Association and would offer the following comments on their behalf. We would like to take this opportunity to comment that we consider it important that there remains in place a telecommunications policy within the emerging Local Development Plan.

It is recognised that telecommunications play a vital role in both the economic and social fabric of communities. National policy guidance acknowledges this through paragraphs 292-300 of Scottish Planning Policy 2014 (SPP 2014) which confirms that the Scottish economy and social networks depend heavily on high quality digital infrastructure.

Paragraph 295 of SPP 2014 confirms that “local development plans should provide a consistent basis for decision-making by setting out the criteria which will be applied when determining planning applications for communications equipment.”

Paragraph 298 of SPP 2014 states that, “consideration should be given to how proposals for infrastructure to deliver new services or infrastructure to improve existing services will contribute to fulfilling the objectives for digital connectivity set out in the Scottish Government’s World Class 2020 document.”

While we support the inclusion of Draft Policy TC13: Digital Connectivity & Telecommunications Infrastructure within the emerging Local Development Plan, we have some concerns about the proposed wording as follows:

The third sentence of Policy TC13 states:

“Where possible, proposals should avoid being located within residential areas, on listed building or in a conservation area.”

The fourth sentence of Policy TC13 states:

“Outwith development boundaries proposals should avoid sensitive locations including areas of ecological and landscape importance.”

The above sentences are not considered to be wholly supportive of telecommunications development and are thereby in conflict with the support for telecommunications within SPP. The 3G and 4G networks, which are currently being rolled out by the mobile operators in the UK, have different technical characteristics to the more established 2G networks and provide much smaller coverage areas. In order to provide high quality 3G and 4G mobile coverage, telecommunications base stations need to be located within the areas where the coverage is required. This includes residential areas; Conservation Areas; and areas of ecological and landscape importance. The restriction of telecommunications equipment in the areas specified could severely
inhibit the Government’s objective to ensure that everyone can enjoy the same degree of access to high quality electronic communication opportunities. There is no national policy or guidance which supports the restriction of telecommunications equipment within certain areas and it is therefore suggested that these sentences are deleted and replaced with:

“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. 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.”

**Summary**

In summary, while we support the inclusion of Policy TC13 within the emerging Local Development Plan, we consider that the sections mentioned above could be overly restrictive to telecommunications developments and contrary to the provisions of SPP. We therefore recommend that the wording is amended as suggested above. If it would be considered useful in creating a concise and flexible telecommunications policy, we would suggest the use of the following wording for Policy TC13:

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

1) 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;

2) 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;

3) 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.

4) 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 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

Ginny Hall MRTPI
SENIOR PLANNER
Direct dial: 0141 270 2733
E-mail: ginny.hall@monoconsultants.com