



Forward Planning
Mid Devon District Council
Phoenix House
Phoenix Lane
Tiverton
EX16 6PP

13 March 2014

Dear Sir or Madam,

MID DEVON LOCAL PLAN REVIEW OPTIONS 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



10 St Bride Street
London
EC4A 4AD
United Kingdom

T +44 (0) 20 7331 2015
E info@ukmoa.org
W [@ukmobileinfo](http://www.mobilemastinfo.com)

Our Ref: GH/MOA

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Dear Sir or Madam,

MID DEVON LOCAL PLAN REVIEW OPTIONS 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 comment on their behalf. We would take this opportunity to comment that we consider it important that there is a specific telecommunications policy within the emerging Local Plan.

It is recognised that telecommunications play 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 of NPPF 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."

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 a concise and flexible telecommunications policy should be included within the emerging Local Plan. Such a policy should give all stakeholders a clear indication of the issues that telecommunications 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 consider it appropriate to introduce the policy and we would suggest the following;

“Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With the growth of services such as mobile internet access, 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.”

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:
E-mail:

_____@_____ .com