



Planning Policy Team
Haringey Council
6th Floor River Park House
225 High Road
Wood Green
London
N22 8HQ

Date: 19 March 2015

Dear Sir/Madam,

HARINGEY COUNCIL – DRAFT DEVELOPMENT MANAGEMENT POLICIES (DPD) CONSULTATION

The Mobile Operators Association (MOA) represents the four UK mobile network operators – 3, Telefonica (O2), EE (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 www.mobilemastinfo.com
[@ukmobileinfo](https://twitter.com/ukmobileinfo)



Planning Policy Team
Haringey Council
6th Floor River Park House
225 High Road
Wood Green
London
N22 8HQ

MONO CONSULTANTS LIMITED
THE MOUNT
2 WOODSTOCK LINK
BELFAST
BT6 8DD
t: 44 (0) 28 90737295 f: 44 (0) 28 90737296
www.monoconsultants.com

19.03.15

Dear Sir/Madam,

HARINGEY COUNCIL – DRAFT DEVELOPMENT MANAGEMENT POLICIES (DPD) CONSULTATION

Thank you for your recent consultation on the above and taking the time to seek the Mobile Operators Associations' views on Haringey Council's draft Development Management Policies (DPD). We consider this a very proactive approach to forward planning and welcome the opportunity to have input in the process.

Paragraph 42 of the National Planning Policy Framework (NPPF) 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.”

We have considered the proposal relevant to the Mobile Operators Association and would offer the following comment on their behalf. While we support the inclusion of Policy DM 9 Telecommunications within the emerging Development Management Policies (DPD), we have the following concerns about the wording of the policy:

Policy DM9: A(c)

Criterion A(c) of Policy DM9 states that telecommunications equipment will be permitted where it can be demonstrated that;

‘The size of the any equipment visible from the street should be should be minimised (including satellite dishes, other domestic equipments and any supporting structures);’

We consider the wording of Criterion A(c) to be ambiguous and potentially overly restrictive in relation to telecommunication development. The operators are committed to ensuring that the amount and dimensions of all newly proposed apparatus be limited to a minimum operational requirement so as to minimise potential impact. We would therefore suggest that this wording is removed from Policy DM9.

Policy DM9: A(e)

Criterion A(e) of Policy DM9 states that telecommunications equipment will be permitted where it can be demonstrated that;

‘They are appropriately designed, coloured and landscaped to take account of their setting. For dishes, this may include installing a mesh or transparent structure;’

We consider the wording of Criterion A(e) to be overly restrictive. The operators are committed to employing means of disguising their apparatus when seeking to address coverage requirements in sensitive locations however due to the siting and design of some telecommunications structures such as a streetworks style pole, it is not always possible to provide landscaping or camouflaging for the installation.

We suggest that Criterion A(e) is amended to the following:

‘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’

Policy DM9: A(f)

Criterion A(f) of Policy DM9 states that telecommunications equipment will be permitted where it can be demonstrated that;

'There is no significant adverse impact on the visual amenities of neighbouring occupiers.'

While it is recognised that operators should exercise great care if locating equipment within areas of high visibility or overlooked by housing, paragraph 44 of NPPF states that;

"Local Planning Authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development."

In accordance with NPPF, the Mobile Network Operators aim to keep the environmental impact of all communications infrastructure to a minimum. We would therefore suggest that Criterion A(f) is removed from Policy DM9.

If it would be considered useful in creating a concise and flexible telecommunications policy, we would suggest the following wording:

"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."

In summary, while we support the inclusion of Policy DM9 relating to Telecommunications Infrastructure, we consider that the sections discussed above are overly restrictive to telecommunications development and should be amended accordingly.

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

Jacquelyn Fee BSc MSc
Mono Consultants Limited