



Our Ref: GH/MOA

Policy and Transport Team
Hertsmere Borough Council
Civic Offices
Elstree Way
Borehamwood
Herts
WD6 1WA

MONO CONSULTANTS LIMITED
48 ST VINCENT STREET
GLASGOW G2 5TS
t: 44 (0) 141 566 6660 f: 44 (0) 141 566 6661
www.monoconsultants.com

04 September 2015

Dear Sir or Madam,

HERTSMERE BOROUGH COUNCIL – SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICIES PLAN

Thank you for your recent consultation on the above and taking the time to seek the Mobile Operators Associations' views on the Hertsmere Site Allocations and Development Management Policies Plan. We consider this a very proactive approach to forward planning and welcome the opportunity to have input in the process.

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.

Paragraph 42 of the National Planning Policy Framework (NPPF) confirms that; *"advanced, high quality communications infrastructure is essential for sustainable economic growth"* and that it *"plays a vital role in enhancing the provision of local community facilities and services."*

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.

While we support the inclusion of Policy SADM31: Design Principles within the emerging Local Plan we have concerns that this policy will be used to assess applications for telecommunications developments, as required by paragraph 5.8 of the Plan. Due to the unique nature of telecommunications developments, it is not considered appropriate that they should be required to fully comply with policies which are aimed at more general forms of development within the Local Plan. Policy SADM31: Design Principles is one such general policy which is considered to be overly restrictive in relation to telecommunications developments. Two such examples are the requirements for telecommunications developments to *'make a positive contribution to the built and natural environment'* and *'compliment the particular local character of the area in which it is located.'*

While the Mobile Operators will always aim to minimise the impact of telecommunications equipment on the character and visual amenity of an area, the technical and operational requirements of the technology mean that, in most cases, it would be very difficult to argue that it makes a 'positive' contribution to the built and natural environment. Unless the telecommunications equipment was located in an industrial setting, it would also be very difficult to argue that it *'compliments the particular local character'* of an area.

On the basis that we consider Policy SADM31 to be overly restrictive to telecommunications developments and therefore contrary to the NPPF, we request that paragraph 5.8 is removed from the Site Allocations and Development Management Policies Plan.

Summary

In summary, while we support the inclusion of Policy SADM31 in the Site Allocations and Development Management Policies Plan, we do not consider it to be a suitable policy for the assessment of applications for telecommunications developments.

We would take this opportunity to comment that we consider it important that there is a specific telecommunications policy within the emerging Local Plan. We consider that the vital role that telecommunications play in both the economic and social fabric of communities merit the inclusion of a policy which refers specifically to telecommunications developments. We would suggest a policy which reads;

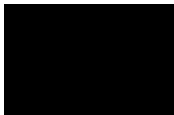
“Proposals for telecommunications development will be permitted provided that the following criteria are met: -

- (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 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