



Development Planning and Environment Manager,
West Lothian Civic Centre,
Howden South Road,
Livingston,
West Lothian,
EH54 6FF

20 November 2015

Dear Sir or Madam,

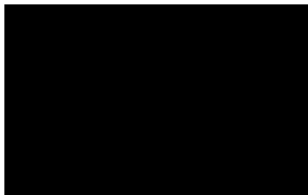
WEST LOTHIAN LOCAL DEVELOPMENT PLAN - PROPOSED PLAN CONSULTATION

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 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,



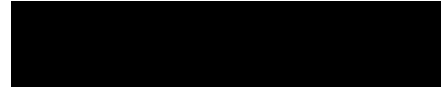
Executive Director



Our Ref: GH/MOA

Development Planning and Environment Manager,
West Lothian Civic Centre,
Howden South Road,
Livingston,
West Lothian,
EH54 6FF

MONO CONSULTANTS LIMITED
48 ST VINCENT STREET



20 November 2015

Dear Sir or Madam,

WEST LOTHIAN 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 INF2: Telecommunications within the emerging Local Development Plan, we have some concerns about the proposed wording as follows:

Policy INF2: Telecommunications – First Sentence

The first sentence of Policy INF2 confirms that proposals for telecommunications developments will be supported where *‘specific locational need has been identified.’* We refer to paragraph 300 of SPP 2014 which states that *‘Planning authorities should not question the need for the service to be provided...’* On that basis, we suggest that the reference to ‘need’ is removed from Policy INF2.

Policy INF2: Telecommunications – Criterion b

While mobile operators take great care to minimise detrimental impact on the natural and built environment, the provision of advanced, high quality electronic communications infrastructure may, in some instances, result in some minor impacts. In these instances it is important that the visual impact of an installation is balanced against the Government’s objective to ensure that everyone can enjoy the same degree of access to high quality electronic communication opportunities.

Given the support for sharing of communications facilities within SPP and PAN62, we consider that Criterion b of Policy INF2 is unduly negative and would be restrictive on the future rollout of telecommunications in the West Lothian area. Sharing of existing telecommunications facilities will normally require the installation of additional equipment for the additional operator which, in most cases, will result in some form of visual impact. On that basis we consider that the requirement in Policy INF2 to ensure that sharing of facilities has no ‘increased adverse visual assessment’ is unreasonable and contrary to SPP and PAN62. In order to

promote site sharing but also ensure that visual impact is minimised, we suggest that Criterion b of Policy INF2 is replaced with the following wording:

“Telecommunications developments, including the sharing of existing facilities, should seek to minimise impact on the visual amenity, character and appearance of the surrounding area.”

Summary

In summary, while we support the inclusion of Policy INF2 within the emerging Local Development Plan, we consider that the sections detailed above are overly restrictive to telecommunications developments and contrary to the provisions of SPP. We therefore recommend that the wording is amended as suggested above.

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:

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