



Development Planning  
West Lothian Council  
County Buildings  
High Street  
Linlithgow  
West Lothian  
EH49 7EZ

15 October 2014

Dear Sir or Madam,

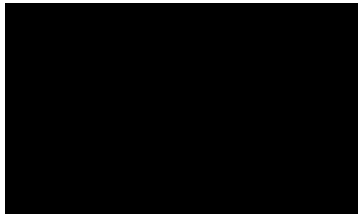
**WEST LOTHIAN COUNCIL LOCAL DEVELOPMENT PLAN – MAIN ISSUES REPORT CONSULTATION**

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



Our Ref: GH/MOA

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MONO CONSULTANTS LIMITED  
48 ST VINCENT STREET  
GLASGOW G2 5TS  
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[www.monoconsultants.com](http://www.monoconsultants.com)

15 October 2014

Dear Sir or Madam,

### **WEST LOTHIAN COUNCIL LOCAL DEVELOPMENT PLAN – MAIN ISSUES REPORT CONSULTATION**

Thank you for your recent consultation on the above and taking the time to seek the Mobile Operators Associations' views on the West Lothian Local Development Plan Main Issues Report.

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."*

There are numerous documents which will affect the formulation of any telecommunications policy. Planning Advice Note 62: Radio Telecommunications (PAN 62) provides detailed siting and design advice on such matters. On this basis we would suggest that within the Local Development Plan there should be a concise and flexible telecommunications policy, and we would therefore 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: 0141 270 2733

E-mail: [ginny.hall@monoconsultants.com](mailto:ginny.hall@monoconsultants.com)



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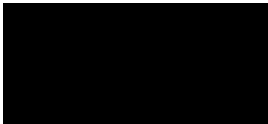
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