

**Review of non-householder permitted
development rights in Northern Ireland**

Mobile Operators Association comments



The Mobile Operators Association represents the five UK mobile network operators - 3, O2, Orange, T-Mobile and Vodafone - on radio frequency health and safety and associated town planning issues.

The comments below set out the mobile network operators' response to questions 21 and 22 of the consultation on the review of non-householder permitted development rights in Northern Ireland.

The operators support in principle the proposals set out in section 5.3 (*Telecommunications*) of the consultation paper. Should these proposals be implemented, we believe that it would be appropriate for the Planning Service to engage with the industry and other stakeholders to discuss the detail of the potential changes. The Mobile Operators Association would welcome further discussions with officials regarding this.

Q21 Should PD rights allowing minor extensions and alterations to existing telecommunication masts, be added to Part 17 (Development by telecommunications code system operators) of the GDO as outlined above?

MOA response

Yes.

The availability of mobile telecommunications services can be a major driver to economic growth. These services can only be made available through the timely deployment of the mobile networks, which provide the coverage and capacity required by users of these services.

The planning system needs to strike a balance between minimising the impact of development and enabling the deployment of infrastructure. These proposals would be a very welcome step towards achieving such a balance.

Enabling the mobile operators to share masts, as proposed in this consultation, could have a significant impact on the delivery of mobile services in Northern Ireland.

The mobile network operators believe that permitted development rights for equipment cabinets should also be introduced. This would facilitate mast and site sharing as such sites will inevitably involve additional radio equipment, electricity cables and other related equipment.

Mast or site sharing and co-location can help reduce the visual impact of mobile networks and often provides the most cost effective solution for the operators.

It should be borne in mind that, while site and mast sharing by operators will always remain a priority, it may not be possible or be the most appropriate environmental solution in every case.

Mast sharing means there is more than one set of antennas on a mast, often making the structure taller. In addition the mast structure needs to be more robust, as it needs to support greater weight, so it may become more visually intrusive. In some cases planning authorities and communities prefer to see several smaller masts, rather than one large mast because smaller masts have less visual impact.

Enabling the replacement of existing masts with new structures would also be welcome. Each of the operators has made significant changes in the way in which they are deploying their networks and, through commercial agreements, are exploring ways in which they can consolidate their network infrastructure.

These agreements involve each of the UK network operators, as follows:

- Vodafone and O2 have an agreement to share masts, sites, cabins and power supply
- 3 UK and T-Mobile UK have an agreement to combine their 3G radio access networks (i.e. both networks use one set of site equipment)
- Vodafone and Orange have an agreement to increase their mutual site sharing

These initiatives demonstrate the operators' ongoing commitment to sharing parts of their networks wherever appropriate, which may assist reducing the overall visual impact of the operators' infrastructure (through a reduction in the number of radio base stations), while continuing to ensure appropriate network coverage and capacity.

The changes proposed in this consultation will be important in enabling these agreements to be implemented in Northern Ireland.

The proposals to allow the extension of an existing mast by 10% above its original permitted height and the addition of new apparatus on an existing mast providing it does not extend the mast above 10% of its original permitted height are also most welcome. However, a general 10% increase in height may not be sufficient to encourage/permit site sharing. For example, a 10% increase in height for a 15-metre mast would be 1.5 metres. Such an increase would most likely be insufficient to give an acceptable separation between antenna systems. Therefore, while we believe the principle of this change to be a good one, the detail of the allowed increase might require further consideration.

The majority of mobile network infrastructure is small and has little impact on the environment. Enabling the operators to make such minor changes to their equipment, without the need to apply for full planning permission, would have two major benefits. First, the changes would enable the operators to quickly respond to increased consumer demand for mobile services. Second, it would reduce the

administrative burden on planning authorities, which would no longer be required to consider detailed applications for such minor amendments, thereby providing greater resources for the considerations of more significant developments.

It is important that the planning system in Northern Ireland is not seen as a disincentive to invest in infrastructure. Additional permitted development rights currently apply in other parts of the UK and inappropriate planning restrictions can affect the way in which limited funds are allocated to network deployment.

Finally, any changes to the regulations (as part of the overall review) should involve a simplification of the wording currently used.

Q22 Should the new Part 17 PD rights as outlined above be permitted in AONBs, National Parks, conservation areas, SAIs and ASSIs?

MOA response

The mobile network operators believe that the same permitted development rights should apply in these areas.