

Question 1.1: If these in principle proposals (set out in Questions 2 to 5) were taken forward, what impact would they have on meeting the Government's ambitions in relation to mobile coverage including addressing 'total not-spots' and 'partial not-spots'?

The proposals are designed to speed up the delivery of 5G and would do so but they should not include 2(3) land without the prior approval of the Local Authorities responsible for that land, For any increase in size, additional housing and all new masts in National Parks a full planning application should be a requirement as their 1st Statutory Purpose is to 'conserve and enhance the natural beauty, wildlife and cultural heritage' and while they have a duty to foster the 'economic and social well-being' of their communities, which in part will include good mobile reception, it is not a statutory priority.

Question 1.2: If these in principle proposals (set out in Questions 2 to 5) were taken forward, what impact would they have on planned deployment of 5G technology ?

Delivery would be speeded up which some members of a community would welcome as a benefit to the local economy but 5G masts if not controlled could be massively intrusive especially in the countryside. The proposals would remove the right of local authorities and communities to have any say in the appropriateness of proposals.

Question 1.3: If these in principle proposals (set out in Questions 2 to 5) were taken forward, what further measures could industry offer to reduce visual impacts of new electronic communications infrastructure and how would these be delivered?

The operators Code of Best Practice states that there is a duty for equipment to be 'sympathetically designed and camouflaged' (*NPPF ch.10 para 43*) The Code could be strengthened (page 17:38 this document). Masts in the countryside would be less obtrusive and have less visual impact if coloured forest green, Operators need to invest in new creative ways of camouflaging the masts as well as using existing buildings - church steeples, fake trees etc. but efforts must be made to minimize the need for new masts which have a physical and visual impact on communities and wildlife, particularly in rural areas; for protected landscapes this must be a priority and in National Parks methods of reducing visual impact must be included in planning applications.

Question 1.4: If these in principle proposals (set out in Questions 2 to 5) were taken forward, what further measures could industry offer to ensure that equipment at redundant sites is removed and the land is restored, and how would these be delivered?

Removal and restoration must be a legal duty not just something the industry offers, and it is vital that there is full transparency of the system for the removal of redundant infrastructure and equipment, a timescale should be stated by operator for the removal and an enforceable duty to make good the land or street scene, proof that this has been officially agreed should be available to communities.

Question 1.5: If these in principle proposals (set out in Questions 2 to 5) were taken forward, what further measures could industry offer to ensure that the use of existing sites and infrastructure were maximised before new sites are identified, for example through increased sharing?

Industry must be made to share sites wherever possible - not just offer further measures. – all operators must provide evidence of investigating this possibility before new sites are developed. Existing sites/ infrastructure must be developed to maximum capacity and operators make evidence of this public before new sites are developed,

Question 2.1: Do you agree with the principle of amending permitted development rights for equipment housing to remove the requirement for prior approval for development within Article 2(3) protected land and on unprotected land which exceeds 2.5 cubic metres, to support deployment of 5G?

NO - there still needs to be control over the size of housing installation, the P.D. criteria a b c d (p.15:29) are essential to constrain proposals; d is vital for Article (2(3) land as it requires prior approval for development so giving L.A.s time to consider the implications of the size proposed, and to considered the impact on an area they are responsible for.

Question 2.2: What impact could this proposal have on the surrounding area and how could this be addressed?

Equipment housing on protected land will add to the visual impact of the mast and take up more ground space therefore housing must be sited as near the mast as possible and well within the safety enclosure of the mast especially where livestock is roaming; cabinets should be as small as possible and be an unobtrusive colour. The impact could be very damaging to protected land and operators need to consult local authorities on how to minimise harm.

Question 3.1: Do you agree with the principle of amending permitted development rights to allow an increase in the width of existing ground-based masts by more than one third, to support 5G deployment and encourage greater utilisation of existing sites?

NO - a substantial increase (1/3+) in ground-based masts would very much depend on the location therefore L.As should have the opportunity to 'consider the effects of the proposed development on the basis of the siting (such as location) and appearance' (P15,30) This is essential for protected land, but for increases in width or height to masts in National Parks a full planning application should be a requirement as the 1st Statutory Purpose of National Parks is to 'conserve and enhance' (as in response 1:2) therefore Local Authorities must have full details of the proposal to carry out this duty; operators' applications should include information on the reasons for any changes and provide evidence that existing masts are not adequate.

Question 3.2: If yes to question 3.1, what increase in width should be granted through permitted development rights, without prior approval, to ensure that the visual impact on the surrounding area is minimised?

Not applicable

Question 3.3: To further incentivise operators to maximise the use of existing sites, should permitted development rights be amended to increase the height of existing masts to the relevant permitted height without prior approval? If yes, what restrictions are appropriate to protect safety and security, and visual impact considerations?

NO - L.As, members of which know their area, their population and future local development plans must have the opportunity to consider the appropriateness of proposals and whether they will benefit their area.