

---

**AYRSHIRE JOINT STRUCTURE PLAN AND TRANSPORTATION COMMITTEE  
8 DECEMBER 2000**

---

**Consultative Draft National Planning Policy Guideline – Radio Telecommunications**

---

PURPOSE OF REPORT

- 1 The purpose of this report is to advise the Committee of the recent publication of the Consultative Draft National Planning Policy Guideline – Radio Telecommunications.

BACKGROUND

- 2 The Scottish Executive have recently issued for comment a draft National Planning Policy Guideline for Radio Telecommunications. This policy framework is also supported by the publication of a draft amendment to the Town and Country Planning (General Permitted) (Scotland) Order and an associated draft Regulatory Impact Assessment.
- 3 The draft policy guidance and proposed legislation has been formulated by the Scottish Executive in response to the report on telecommunications by the Transport and Environment Committee of the Scottish Parliament. This was issued in March 2000 and reported to Joint Structure Plan Committee in June. The guidance also has regard to the findings of the Independent Expert Group on mobile phones which presented their report in May of this year.

SCOTTISH EXECUTIVE POLICY

- 4 The Scottish Executive policy will have the effect of placing the development of telecommunications facilities under greater planning control. This will ensure that the telecommunications industry is able to expand and diversify in a way that is sensitive to the environment and allows concerns on health issues to be addressed.
- 5 The draft NPPG sets out how this can be achieved by outlining how the telecommunication industry is currently regulated and the role of the main bodies. It places emphasis on the economic importance world class telecommunications are to

Scottish business and the social benefits to individuals which can occur. The guidance outlines the government response to the Independent Expert Group on Mobile Phones (IEGMP) report which considered the health effects of mobile phones, base stations and transmitters. The guidance in this regard presents a summary of the precautionary approach and the weight that should be attached to health issues as a national consideration in determining planning applications.

- 6 The draft policy guidance recognises that the siting and design of telecommunications development are key issues that require to be addressed through the planning system. It advocates the sharing of most sites where this would represent the best environmental solution and the safeguarding of the urban and rural environment particularly within sensitive areas such as the vicinity of schools, nationally recognised landscapes and natural and built heritages locations.
- 7 The guidance emphasises that the careful siting and design of telecommunications which are sensitive to the built form and natural environment must be the norm for new development.
- 8 Of significance however is the view taken within the guidance that telecommunications development is unlikely to raise strategic locational or land issues which can be addressed in Structure Plans. This comment is strange given the social, environmental and economic issues addressed in the draft guidance and inconsistent with the modifications by the Scottish Ministers to the Ayrshire Joint Structure Plan which sought this area to be addressed.

#### COMMENT

- 9 The Ayrshire Joint Structure Plan & Transportation Committee does not hold the view that the role of the Structure Plan is limited in the development of telecommunication facilities in Scotland. On the contrary, in the absence of any national framework or spatial component to the draft National Guidance the Structure Plan plays a key role in the safeguarding environmentally sensitive areas identified within the guidance and the additional designations which are advocated by the Transport and Environment Committee Report, ANNEX B and which are only partially addressed within the context of the draft NPPG.
- 10 The Structure Plan provides a key strategic role within which issues such as public concern about health issues, siting, amenity visual impact and design considerations can be addressed. The evidence to date from the work undertaken by the Joint Structure Plan Committee is that the Structure Plan can play a key role in supporting three areas. These are being proactive by safeguarding locations, in ensuring competitiveness and in the monitoring and evaluation of impacts.

(a) Proactive

Proactive with the operators and addressing issues of mutual strategic significance such as developing a strategy which addresses:

- cross boundary issues;
- identifies strategic constraints;
- aids the promotion of social inclusion by promoting greater geographical coverage; and
- aids the promotion of inward investment and economic growth in rural areas.

(b) Competitiveness

- ensuring competitiveness – by reaching agreement on areas for future telecom development;

(c) Monitoring & Evaluation

- evaluating the cumulative impact of telecoms development within urban and rural areas, and addressing the current piece-meal development of the sector.

CONCLUSION

- 11 The content and intent of the draft NPPG is generally supported however the failure to incorporate more locational and directional guidance within the draft NPPG and offering only a limited role for Structure Plans is of significant concern. This omission is also of particular worrying given the need to ensure that the needs of industry are adequately safeguarded. It is strongly suggested to the Scottish Executive that in the absence of any vehicle for a National Framework they consider the scope that exists for the incorporation of a spatial component within this draft guidance. This could in time be reflected nationally within Structure Plans. This approach would not be without precedence, for example NPPG 2, Business and Industry.

RECOMMENDATION

12 It is recommended that the committee:

- approve the contents of this report;
- forward a copy to the Scottish Executive as the views of the Joint Structure Plan Committee and express concern at the lack of any role for the Structure Plan process in the development of the telecommunication industry in Scotland.

Ian Johnson  
Manager  
Ayrshire Joint Structure Plan & Transportation Committee

Person to Contact: John Esslemont – 01292 673766