

SALFORD CITY COUNCIL
SUPPLEMENTARY PLANNING DOCUMENT
TELECOMMUNICATIONS
May 2007

STATEMENT OF MAIN ISSUES RAISED IN REPRESENTATIONS
TOWN AND COUNTRY PLANNING (LOCAL DEVELOPMENT) (ENGLAND)
REGULATIONS 2004
Regulation 18(4)(b)

1. Introduction

Under the Town and Country Planning (Local Development) (England) Regulations 2004, it is a requirement to prepare and publish a Consultation Statement for a range of planning policy documents including Supplementary Planning Documents (SPDs). This is a reflection of the Government's desire to 'strengthen community and stakeholder involvement in the development of local communities'.

This document is a statement of the main issues raised in representations about the draft Supplementary Planning Document on Telecommunications, and how those issues have been addressed in the SPD. It is prepared under Regulation 18(4)(b) of the aforementioned Regulations. This statement also incorporates details from the previous consultation statement, published in February 2007, under Regulation 17(1), which details the consultations that were carried out in the preparation of the draft SPD.

In due course, the Council will be adopting a Statement of Community Involvement (SCI) that will set out how the public will be consulted on new planning policy and significant planning applications. Once the SCI is adopted, which is due to be in May 2008, planning documents will be required to conform to its provisions.

This Consultation Statement has been prepared in advance of the SCI, but aims to reflect the intentions of Government planning guidance for reporting on community involvement in the Plan making process. It describes the involvement of stakeholders in the preparation of the Telecommunications SPD.

The consultation process adopted meets both the minimum requirements set out in the Town and Country Planning (Local Development) (England) Regulations 2004 and the gold standards in community involvement devised by Partners IN Salford.

2. Gold Standards IN Community Involvement

Partners IN Salford (Salford's Local Strategic Partnership) have devised 5 aspirational standards for community involvement and all partners of the Council are signed up to delivering community involvement in this way (www.partnersinsalford.org/communityinvolvement). The Gold Standard is a goal for partners to aim towards, particularly where there is activity or proposed change within the City that will have a significant impact upon local communities. They are:

- 1) Value the skills, knowledge and commitment of local people.
- 2) Develop working relationships with communities and community organisations.
- 3) Support staff and local people to work with and learn from each other (as a whole community)
- 4) Plan for change with, and take collective action with, the community.
- 5) Work with people in the community to develop and use frameworks for evaluation.

3. Background

The city council has commissioned Urban Vision Partnership Ltd to produce an SPD for Telecommunications. The objective of the SPD is to provide guidelines against which applications for telecommunications equipment, such as mobile phone masts, will be assessed.

Urban Vision has led the ongoing consultation exercise that underpins the process of formulating the policies contained within the SPD.

4. Initial Process of Consultation

A number of consultation exercises were undertaken prior to the preparation of the consultation draft SPD, in order to:

- Determine what guidance additional to UDP Policy DEV1 is required to make the process of applying for planning permission/prior approval more simple/transparent whilst ensuring high quality telecommunications development; and
- Establish the main concerns of local communities with regards to telecommunications installations and how these can be addressed.

To realise these aims of the consultation process, it was decided that workshops should be set up with representatives from the five mobile phone operators, agents who frequently submit telecommunications applications to Salford City Council, and Wi-Fi providers. In addition, a short document and accompanying questionnaire were sent to members on the Planning and Transportation Regulatory Panel, Planning Scrutiny Sub-Committee members, representatives of Salford's eight Community Committees, and the people who registered an interest in the Telecommunications SPD.

Workshop with Representatives from the Telecommunication Operators, their Agents and the Mobile Operators Association

Workshops were held on the 26th October and the 14th November 2006 at Emerson House, Eccles. The list of people who attended can be found in Appendix A. The workshop commenced with a presentation from Urban Vision on behalf of the city council which provided an introduction to Salford City Council's UDP Policy on telecommunications development and the contents of the city council's existing (un-adopted) Supplementary Planning Guidance note on telecommunications, before setting out the suggested scope and probable objectives of the Supplementary Planning Document.

Each workshop then developed discussion guided by several specific questions:

- **Could the SPD look to introduce restrictions/guidance on the design of installations in particular locations?**
 - What factors influence the design and height of the proposed installation?
- **How can the document address public concern relating to telecommunications development?**
 - Would it be beneficial to include information on positive aspects of telecommunications development/why installations are required?
 - What information could the document contain on health issues?
- **Could the SPD look to introduce a sequential approach prioritising mast and site sharing?**
 - Is it practical to introduce such guidance or is the existing policy sufficient?
 - What are the obstacles that prevent mast/site sharing in certain situations?

- **Are there any particular sections of the Telecommunications SPG that should be either retained or changed/not taken forward in the Supplementary Planning Document?**
 - Are the policies contained within the SPG appropriate or do they require re-assessing?
 - Should the layout and format of the document be revised from its current form in the SPG?
- **What other issues should be considered?**

Each workshop lasted for approximately two hours. A summary of the main issues raised is set out below:

Comments Received	Council's Response
<p>The inclusion of guidance on perceived health impacts would be helpful but it would have to be very carefully worded, otherwise a 'can of worms could be opened'.</p>	<p>It is recognised that the perceived health effects associated with telecommunication development, particularly mobile phone installations, is a source of concern for the public. Planning Policy Guidance Note 8 (PPG8) sets out very clearly the Government's view on public health concerns about telecommunications masts, and the approach that local planning authorities should take in this respect. However, for clarity, information on the perceived health effects associated with telecommunications development, including the limit of the city council's control on health issues, is included in the SPD.</p>
<p>A very important point to make would be to explain the ICNIRP standards and why this represents the precautionary approach...and then explain what the actual level of emissions from masts are in the context of the ICNIRP standards. However, it is dangerous to make claims about health impacts that could be challenged.</p>	<p>It is recognised that the perceived health effects associated with telecommunication development, particularly mobile phone installations, is a source of concern for the public. The SPD incorporates information to explain what the ICNIRP standards are, how they represent a precautionary approach for public health, and that permission for telecommunications development, such as mobile phone base stations, will only be permitted if the applicant has demonstrated compliance with all relevant ICNIRP standards.</p>
<p>A problem is that all operators seek installations in similar locations (e.g. along main arterial routes) – guidance on when mast sharing and site sharing would be acceptable would be very useful.</p>	<p>It is a policy objective of the Government and Salford City Council to encourage telecommunications operators, where feasible, to share masts and sites as a means of reducing overall mast numbers and hence the visual impact of new developments. The SPD establishes a hierarchy that prioritises the sharing of existing telecommunication sites/installations and requires applicants to demonstrate that they have considered all practicable options further up this hierarchy.</p>
<p>Practical guidance on where the cabinet should be sited (e.g back of footpath), etc., would also be useful.</p>	<p>Guidance on the siting of installations is provided in the SPD.</p>
<p>It is difficult to provide a catalogue of design options because there are so many</p>	<p>Noted</p>

<p>differences with each site that an individual assessment is usually required. Bespoke designs are limited in terms of modifying them (which is usually needed) and in terms of health and safety. Therefore, they are the exception rather than the rule. Dummy replacement lampposts are an option, but they can be very problematic in terms of maintenance and lights not being on.</p>	
<p>Guidance on structures within residential areas is needed, especially with regard to the 3G networks, which uses closer masts.</p>	<p>Policies on the design and siting of installations are incorporated in the SPD.</p>
<p>Salford City Council's (un-adopted) Supplementary Planning Guidance (SPG) Note for Telecommunications contains a useful section on the perceived health impacts of telecommunications development.</p>	<p>A section on the perceived impact on health associated with telecommunication development is incorporated into the SPD.</p>
<p>The format of the Telecommunications SPG could be reviewed/simplified.</p>	<p>Noted</p>
<p>Guidance on why an installation is needed would be useful to help the community understand the issues.</p>	<p>The city council recognises that modern telecommunications systems have a vital part to play in our national life and bring significant economic and social benefits. A section to provide guidance on why telecommunications installations are needed has been incorporated into the SPD.</p>
<p>The SPD needs to be written in such a way that the layperson can understand it. There is no point in making it too technical.</p>	<p>Noted</p>
<p>Providing an explanation on what is Permitted Development, what is prior approval, and what needs full planning permission would be useful.</p>	<p>The SPD includes a chapter to explain the three categories of planning application. However, it is recognised that this can be difficult to explain and can mean the document becomes out of date if Part 24 of the General Permitted Development Order is revised.</p>
<p>It would be useful to provide an explanation of the scheme of delegation to clarify when an application will be determined under delegated powers and when it will go to panel.</p>	<p>For clarity, an explanation of when an application will be determined by the Planning and Transportation Regulatory Panel has been provided in the SPD. An internet link to Salford City Council's Scheme of Delegation has also been provided.</p>
<p>The SPD should set out what consultation the Local Planning Authority would normally carry out, and the developer should normally mirror or exceed these standards of consultation.</p>	<p>Salford City Council is preparing a Statement of Community Involvement (SCI) that sets out the council's policy for consultation on planning applications and how the council will engage the community and stakeholders in the preparation of Planning documents. However, the SPD does provide an overview of the publicity and notification that the city council currently carry out for each application for prior approval or full planning permission.</p>

Workshop with Representative of a Wi-Fi Provider

This workshop was held on Wednesday 1st November 2006 at Emerson House, Eccles. Again, the workshop commenced with a presentation which provided an introduction to Salford City Council's existing policy on Telecommunications development, before setting out the suggested scope and objectives of the document, including the aim of supporting the development of a high quality telecommunications network throughout the City. Following the presentation, discussion was opened up based on the following questions:

- **What guidance/policies could the SPD incorporate to support the development of a wireless city through wi-fi?**
- **What installations are required to deliver wi-fi networks?**
- **What other issues should be considered?**

The workshop lasted for approximately one hour. A summary of the main issues raised is set out below:

Comments Received	Council's Response
Salford Quays would be the logical starting point for establishing a dense coverage but there may also be opportunities to develop a network around the University/Chapel Street area.	The SPD encourages the provision of wi-fi hotspots in major developments within the Arc of Opportunity, and the heart of the mediacity:uk area around Quays Point.
However, wi-fi is not economical for first users – value is added with each new user on the same network. If one business installs a wi-fi hotspot they will only get wireless broadband access within the range of that hotspot (usually 100m in urban areas). Once a key group of businesses recognises the value of wi-fi it becomes self-sustaining – as businesses pay for hot spots to be established themselves	The benefits of wi-fi are set out in the SPD. In addition, by encouraging a dense wi-fi coverage within the Arc of Opportunity, and the heart of the mediacity:uk area around Quays Point, the SPD seeks to make the installation of wi-fi self-sustaining.

Questionnaires

To build upon this initial input, a short background information document and accompanying questionnaire were sent to members on the Planning and Transportation Regulatory Panel, Planning Scrutiny Sub-Committee members and the representatives of Salford's eight Community Committees. Copies of the document and questionnaire were also distributed to the people who had registered an interest in the document.

The document informed people that a telecommunications SPD was being produced; stated what the document's objectives were likely to be; identified the limits of our controls on health issues; and the fact that the SPD has to be consistent with the UDP (setting out what Policy DEV1 says). A copy of Salford City Council's draft telecommunications SPG was also sent out.

The accompanying questionnaire endeavoured to ascertain information on a number of issues, including whether the objectives of the SPD were supported; what the main concerns of local communities are with regards to telecommunications installations; and whether there were any sections of the existing SPG that they felt should be retained or required changing.

A summary of the responses is provided below:

Comments Received	Council's Response
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<p>The design of installations can make a huge difference. Paint effects, such as false bricks, can minimise impact greatly; and the “tree” design looks good in more rural settings. Disguising masts as lamp-posts or flag poles are other design solutions</p>	<p>The SPD seeks to minimise the environmental impact of new installations without compromising network coverage. Guidance is provided on designing installations to minimise visual intrusion of installations. Bespoke design solutions are limited in terms of modifying them (which is usually needed) and in terms of health and safety. Therefore, they are the exception rather than the rule. However, where proposals are in prominent locations, proposals for “architectural” or “sculptural” may be sought.</p>
<p>Because of the health risks, masts should not be permitted in residential areas.</p>	<p>It is recognised that the perceived health effects associated with telecommunication development, particularly mobile phone installations, is a source of concern for the public. However, PPG8 clearly states that in the Government's view, local planning authorities should not implement their own precautionary policies, for example by way of imposing a ban or moratorium on new telecommunications development or insisting on minimum distances between new telecommunications development and existing development.</p>
<p>It is important to keep the SPD brief and condensed</p>	<p>Noted</p>
<p>The proliferation of masts in prominent positions is a source of concern.</p>	<p>The SPD seeks to minimise the environmental impact of new installations without compromising network coverage. Guidance is provided in the SPD on the design and siting of telecommunications development in order to minimise the impact of telecommunications development on visual amenity.</p>
<p>Pre-development discussions should consult with the Highways Agency about any mast proposed to be installed adjacent to, or close to, the trunk road network.</p>	<p>Noted</p>
<p>Local residents should have the final say on where masts are located.</p>	<p>The city council will carry out appropriate notifications and publicity for each application for prior approval or full planning permission. Individual letters notifying neighbouring owner/occupiers of land and property will be sent; site notices may be placed on or near the application site and a notice may also be put in the local press. All comments received will be taken into account when assessing applications.</p>
<p>The visual intrusion of telecommunications infrastructure into the landscape and townscape is a main concern of telecommunications development.</p>	<p>The SPD seeks to minimise the environmental impact of new installations without compromising network coverage. Guidance is provided in the SPD on the design and siting of telecommunications development in order to minimise the impact of telecommunications development on visual amenity.</p>
<p>Installations can become a target for vandals</p>	<p>The SPD makes reference to the city councils Design and Crime SPD that</p>

	provides guidance on designing out crime in new developments.
There are grey areas between simple, straightforward plans those that are complex and more controversial. Should the consultation document not attempt to share with the public these 'delegated powers'?	For clarity, an explanation of when an application will be determined by the Planning and Transportation Regulatory Panel has been provided in the SPD. An internet link to Salford City Council's Scheme of Delegation has also been provided.

5 Formal Public Consultation

The SPD documents were subject to a 6 week period of formal public consultation from 9th February to 22nd May 2007. These documents were available for inspection at the following locations:

- On the council's website: <http://www.salford.gov.uk/telecommunicationspd>
- Civic Centre, Salford City Council, Chorley Road, Swinton, Salford, M27 5BW. Opening times: Monday to Friday, 8.30am to 4.30pm.
- At all Salford Libraries during normal opening hours

The statutory consultees that were formally invited to comment by letter on the draft SPD are listed at Appendix B.

6 Representations Received

The following organisations/persons submitted representations within the formal public consultation period:

- Government Office for the North West
- Mono Consultants
- Natural England
- Salford City Council Economic Development Group
- United Utilities

Appendix C sets out a detailed schedule of all representations, the council's response, and proposed changes to the SPD.

7 Main Issues Raised

Pre-application consultation and the Traffic Light Rating system: Concern was raised that the document does not contain many references to the pre-application consultation process including the Traffic Light Rating system.

The council supports this change and appendix 1 has been amended accordingly in order to provide some explanation of the pre-application process.

Processing Applications: Mono Consultants, responding on behalf of the Mobile Operators Association, questioned the appropriateness of the council consulting schools and colleges within 200m of a proposed installation. They believe it is more important that the level of community consultation applied to any site should be proportionate and appropriate to the merits of the individual proposal, rather than prescribed by an arbitrary radius.

Planning Policy Guidance note 8 (PPG8) states that where a mast is proposed to be installed on or near a school/college the local planning authority should consult the relevant body of

the school/college concerned and take into account any relevant views expressed. It also makes clear that operators should discuss the proposed development with the relevant body of the school or college before submitting an application.

PPG8 does not offer a definition of what constitutes 'near to' when considering consultation with schools. Nevertheless, it is implied that there is distance within which a school/college should be consulted. Salford City Council considers that 200m represents an appropriate distance. Therefore, it is considered that the guidance on processing applications does not need amending.

Freestanding installation on footways: Mono Consultants, responding on behalf of the Mobile Operators Association, argued that stipulating that installations should normally avoid reducing the footway width to less than 2m is slightly onerous and could lead to otherwise acceptable installations, which represent the optimum environmental option, not being chosen.

The council recognises that a range of issues need to be taken into consideration when determining what represents the optimum environmental option for the design and siting of telecommunications installations. Nevertheless, the Department of Transport's "Inclusive Mobility" Best Practice Guide states that under normal circumstances footways should be a minimum of 2000mm wide in order to allow two wheelchairs to pass one another comfortably. Consequently, Policy TEL3 is considered to be in accordance with national guidance on minimum footway widths.

In addition, Policy TEL3 states that **normally** we would seek to avoid installations that would reduce the width of the footway to less than 2m. This allows for a degree of flexibility. However, by specifying a distance, rather than stating that installations should "avoid reducing the footway to an unacceptable width", Policy TEL3 provides greater clarity over the footway width that the council would usually seek to retain and makes applicants aware that any departure from this standard should be fully justified. Therefore, it is considered that Policy TEL3 does not require amending.

8 Sustainability Appraisal

In adopting the final draft, the council must consider how sustainability issues have been integrated into the document and how the Sustainability Appraisal (SA) has been taken into account.

Recommendations for changes to the consultation draft are included in the SA report that accompanies the SPD. None of the representations received questioned the content of the SA.

The appraisal has been amended to reflect the changes to the SPD made in response to other representations. It is considered that sustainability issues have been adequately addressed. The revised SA is published on the council's website (www.salford.gov.uk/telecommunicationspd).

9 Equality Impact Assessment

In accordance with the Race Relations (Amendment) Act 2000, a first stage Equality Impact Assessment has been carried out on the draft SPD. This concluded that a more detailed appraisal was not required, as the SPD has no significant differential impact on any group.

The assessment is available on the council's website (www.salford.gov.uk/telecommunicationspd).

Appendix A

LIST OF STAKEHOLDERS INVOLVED IN CONSULTATION PRIOR TO THE
PREPARATION OF THE CONSULTATION DRAFT

LIST OF STAKEHOLDERS INVOLVED IN CONSULTATION TO DATE	METHOD OF CONSULTATION	
	Consultees	Workshop
Philip Heeds (O2)	X	
Carolyn Wilson (MONO Consultants / MOA)	X	
Chris Gainey (Ericsson / 3)	X	
Steven Axon (Manchester Metronet)	X	
Michael Beattie (TeleGeneration)	X	
Paul Lapatrie (Lambert Smith Hampton)	X	
James Nicol (Daly International)	X	
Peter Ball		X
Mr Nazar		X
Ian Stewart		X
K Taylor		X
L Chappell		X
Kay Newgent (BAO Ltd)		X
Alison Truman (British Waterways)		X
Andrew Thomson/Adele Snol (Broadway Malyan)		X
Planning Policy Sections (Bury MBC, Bolton MBC, Manchester City Council, Rochdale MBC, Stockport MBC, Tameside MBC, Trafford MBC, Warrington Borough Council, Wigan MBC)		X
Liz Brown (CABE)		X
Richard Lomas (CB Richard Ellis Ltd)		X
Director of Development (Central Salford URC)		X
H Siepmann (Civil Aviation Authority)		X
H Lancaster/D Chambers (CLA NORTH)		X
Mr J Wilcock (Cliff Walshingham)		X
Mrs Siigurnjak (Clifton Hamlet		X
R Jackson (Cooperative Group Property Division)		X
Tony Hill (Cophthorne Hotel)		X
Peter Lloyd (David McLean Ltd)		X
Frank Roesiger (DEGINSSA CC UK Ltd)		X
Janet Matthewmann (Dept. of Culture Media and Sport)		X
Rachel Patterson (Dev Plan UK)		X
Justin Cove (DTZ PIEDA Consulting)		X
B Thompson (Ellesmere Park Residents Association)		X
Judith Nelson (English Heritage)		X
Louisa Cusdin (Framptons)		X
Phil Lally (GONW)		X
Anita Shaw (Greater Manchester Waste Disposal Authority)		X
Helen Barker (Groundwork Manchester, Salford and Trafford)		X

Angela Mealing (Higham and Co.)		X
Kristian Marsh (Highways Agency)		X
Jane Aspinall (HOW Planning)		X
Mr J Shelley		X
Veronica Fowler (Irlam Medical Centre)		X
Harry Pennington (J. Fletcher Ltd)		X
Emma Latimer (Knight Frank)		X
Alan Castle (Magnesium Elektron Ltd)		X
Linda Moore (Manchester & District Housing Association)		X
Nigel Spaggins (Manchester Diocesan Board of Finance)		X
Darren Belcher (Mawdsley Brooks Co.)		X
Kathryn Brindley (MCP Planning)		X
Daniel Connolly (Morris Homes Ltd.)		X
Janet Belfield (Natural England)		X
Brian Enright (NDC)		X
Jill Stephenson (Network Rail)		X
Julian Niman (Nimans Ltd)		X
Ian Wray (NWDA)		X
Andrew Bower (Npower Renewables)		X
Mr R J Newton/Samantha Turner (NWRA)		X
Mrs W Moore (Partington Town Council)		X
Sarah Smith (Paul Butler Associates)		X
Michael Nuttall (Peel Holdings)		X
Philip Rothwell (PRDS)		X
David Light (PZ Cussons)		X
A Bishop (RMS International)		X
Stuart Cooper (Roger Hannah and Co.)		X
Timothy Jones (Roland Bardsley)		X
David Allen (Safety Systems UK Ltd)		X
Mary Ann Byrne (Salford Disability Forum)		X
Michael Jones (Royal Mail)		X
Trevor Adey (Savills)		X
Frazer Sandwith (Scott Wilson)		X
Michelle Grimshaw (Steven Abbott Associates)		X
Richard Fearnall (Strutt and Parker)		X
James Doherty (Swinton Judo Club)		X
Kath Ludlam		X
Katy Lightbody (The Development Planning Partnership)		X
D.W. Short (The Emerson Group)		X
Helen Winkler (Tyler Parkes Partnership)		X
Lee Bullock/Annette Elliot (United Co-operatives Ltd)		X
Hannah Philip (Vincent and Goring)		X
Vicki Richardson (Walton and Co)		X
Ivor Zott (Wardley TP)		X
Paul Shuker (White Young Green Planning)		X

Council Members of the Planning and Transportation Regulatory Panel		X
Council Members of the Planning Scrutiny Sub-Committee		X

Appendix B

STATUTORY, GENERAL AND SPECIFIC CONSULTEES WHO WERE INVITED TO COMMENT ON THE DRAFT SPD (IN ADDITION THOSE LISTED IN APPENDIX A)

Bolton MBC
Bury MBC
CABE
Central Salford Regeneration Company
Charlestown and Lower Kersal New Deal for Communities Partnership Board
Civic Trust (Northern Office)
English Heritage
English Nature
GM Archaeological Unit
Government Office North West
Greater Manchester Ecology Unit
Greater Manchester Geological Unit
Manchester City Council

Mobile Operators Association
North West Development Agency
North West Regional Assembly
Salford CAB

Salford Community Network
Salford Disability Forum

Sustainability North West
The Countryside Agency
The Environment Agency

Stockport MBC
Tameside MBC
Trafford MBC
Warrington BC
Wigan MBC

Appendix C

SCHEDULE OF RESPONSES TO CONSULTATION DRAFT AND THE COUNCIL'S
RESPONSE

Paragraph / Policy	Respondent	Nature of Response	Council's Interpretation of Representation	Council's Response	Proposed Changes
Whole document	SCC Economic Development	Support	<p>I would like to support this paper:</p> <p>There are a number of benefits for Salford that will result from a better, more consistent and technologically advanced wireless communications infrastructure.</p> <p>Regions that can show they are able to provide wi-fi services will attract businesses wishing to exploit the new applications this enables. The consistent availability of different wi-fi networks throughout Salford will encourage greater consumer choice and an enhanced range of services being made available across the social spectrum.</p>	Comments noted	No changes proposed to the approach of the SPD
Section 4	Mono Consultants	Observation	We concur with the advice contained in Section 4 entitled "Health and Safety Considerations" which is consistent with PPG8 on this matter, and in particular that the Council considers that the submission of the relevant ICNIRP declaration will be sufficient to demonstrate that the proposed development would not have an unacceptable impact on people's health.	Comments noted	No changes proposed to the approach of the SPD
Section 6	Mono Consultants	Observation	Section 6 "Processing Applications" provides information regarding the consultation process undertaken by the Council on the different types of development. However, very little mention is made in the document regarding the pre-application consultation process including the Traffic Light Rating system.	The Council supports this amendment.	A section has been added in Appendix 1 to explain the pre-application process and the Traffic Light Rating system
Para 6.17	Mono Consultants	Observation	It is noted in paragraph 6.17 that a distance of 200m is specified as the distance within which the Council and the applicant will consult a school or college. The operators however tend not to use distance from the proposed installation as the determining factor as to whether community consultation is carried out. They believe it is	Planning Policy Guidance note 8 (PPG8) states that where a mast is proposed to be installed on or near a school/college the local planning authority should	No changes proposed to the SPD

			<p>more important that the level of community consultation applied to any site should be proportionate and appropriate to the merits of the individual proposal, rather than prescribed by an arbitrary radius.</p> <p>In relation to nurseries, school and colleges the Code of Best Practice offers specific consultation advice. Paragraphs 54 – 61 of the Code of Best Practice describes this advice and within it there is deliberately no distance given. Instead operators and local planning authorities are advised that consultation with schools and colleges of further education should be considered on a case-by-case basis and according to a number of factors. Given the above, we would consider it more appropriate to remove the specified radius for consultation/notification and reiterate the advice contained in the Code of Best Practice relating to pre-application discussions and consultations.</p>	<p>consult the relevant body of the school/college concerned and take into account any relevant views expressed. It also makes clear that operators should discuss the proposed development with the relevant body of the school or college before submitting an application.</p> <p>PPG8 does not offer a definition of what constitutes 'near to' when considering consultation with schools. Nevertheless, it is implied that there is distance within which a school/college should be consulted. Salford City Council considers that 200m represents an appropriate distance. Therefore, it is considered that the guidance on processing applications does not require amending.</p>	
Para 7.6	Mono Consultants	Observation	We note that the Council intend to prepare and operate a mast register and this is welcomed by the operators and we further support the Council in their encouragement of pre-application discussions with the operators on both individual proposals and the annual rollout plans.	Comments noted	No changes proposed to the approach of the SPD
Policy TEL1	Mono Consultants	Support	This is informative in relation to the Council's desired siting and design requirements for proposed installations, which will be of assistance to the operators and their agents in selecting the most appropriate proposals for an area.	Comments noted	No changes proposed to the approach of the SPD

<p>Policy TEL3</p>	<p>Mono Consultants</p>	<p>Observation</p>	<p>We generally support the guidance relating to Free-Standing Installation on or Near Footways, although would consider that the guidance that “installations located on or near a footway should normally avoid reducing the footway width to less than 2m” is slightly onerous.</p> <p>Whilst we accept that this guidance states that normally 2m clearance will be sought, and elaborates within section 7.17 that installations should avoid reducing the footpath width below acceptable limits to allow free flow of pedestrians or wheelchair users, we would consider that 2m is beyond what is considered to be an acceptable limit.</p> <p>We would be concerned that whilst the wording of the guidance states that normally 2m clearance is required, that by specifying a distance within the guidance, consideration will not be given to circumstances where this minimum distance cannot be met, and which otherwise may be acceptable in terms of siting and design. This may result in the optimum environmental option not being chosen, as the footway would not allow for the specified 2m clearance. We would suggest that the criteria in Policy TEL3 should state “avoid reducing the footway to an unacceptable width”.</p>	<p>Following the introduction of the Disability Discrimination Act 1995, the Department of Transport’s produced the “Inclusive Mobility” Best Practice Guide. This provides guidance on minimum footway widths to allow for access for persons with disabilities. The guidance states that <i>“a clear width of 2000mm allows two wheelchairs to pass one another comfortably. This should be regarded as the minimum under normal circumstances. Where this is not possible because of physical constraints 1500mm could be regarded as the minimum acceptable under most circumstances, giving sufficient space for a wheelchair user and a walker to pass one another”</i>. Consequently, Policy TEL3 is considered to be in accordance with national guidance on minimum footway widths.</p> <p>In addition, Policy TEL3 states that normally we would seek to avoid installations that would reduce the width of the</p>	<p>No changes proposed to the approach of the SPD</p>
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				footway to less than 2m. This allows for a degree of flexibility. However, by specifying a distance, rather than stating that installations should “avoid reducing the footway to an unacceptable width”, Policy TEL3 provides greater clarity over the footway width that the council would usually seek to retain and makes applicants aware that any departure from this standard should be fully justified.	
Appendix 1	Mono Consultants	Support	Appendix 1 ‘Frequently Asked Questions’ is particularly helpful in explaining why the ICNIRP declaration represents the precautionary approach to telecommunications development as advocated by the recommendation of the “Stewart Report” and the UK Government.	Comments noted	No changes proposed to the approach of the SPD