

GODALMING TOWN COUNCIL

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The Rt Hon Michael Gove MP
Secretary of State for Levelling Up, Housing & Communities
and Minister for Intergovernmental Relations
2 Marsham Street
London
SW1P 4DF

Dear Mr Gove

Digital Infrastructure Planning Strategy

I write on behalf of Godalming Town Council to request that consideration is given to the need for the telecoms industry to operate within a strategic framework for the benefit of the communities their infrastructure serves as well as the telecommunication companies themselves.

Local authorities make considerable efforts to engage with and develop a Local Plan that meets the needs of their communities. The Local Plan is supported by Neighbourhood Development Plans, which through the referendum process, reflect the agreement of the local community for future development within the locality. As you will be aware, these processes take considerable time and require a great deal of consultation with residents in order to be adopted. In achieving these local planning frameworks residents and developers are able to work through the planning process towards an acceptable and coherent future for their communities.

It is in the context of this level of community involvement and co-operation that Godalming Town Council considers that the way telecom companies are applying Part 16 of the Town and Country Planning (General Permitted Development) (England) Order 2015 flies in the face of a co-ordinated and coherent approach to planning.

At present where a communications code operator considers its development complies with the restrictions and limitations outlined under Part 16 of the Town and Country Planning (General Permitted Development) (England) Order and does not require planning permission, it is required to notify the Planning Authority of its proposals and submit a notification for prior approval. The Planning Authority cannot object to the principle of erecting the telecommunications structure, but has 56 days to comment upon the siting and appearance. Amongst other activities, this procedure applies to the siting of a mast.

The prior approval procedure allows the Planning Authority to approve or refuse details of the siting and appearance of the installation. The 'siting' and 'appearance' of the proposal are the only factors that can be considered under an application for prior approval. No other matters can be considered. Factors concerning siting may involve:

- height of the site in relation to surrounding land;
- topography of the site and vegetation;
- openness and visibility of the site;
- designated areas;
- the site in relation to existing masts;
- structures or buildings; and
- proximity to residential property.

With regard to appearance this can include details such as:

- materials;
- colour;
- design;
- dimensions;
- overall shape; and
- solid or open framework.

Godalming Town Council fully accepts the need for good digital connectivity. However, what it suggests is that the lack of any strategic approach to work with local authorities to produce a coherent plan, that can be accepted by the community, undermines the idea of localism and causes delays in the efficient delivery of digital infrastructure.

As shown above, the factors that can limit the siting and appearance of a mast are relatively wide ranging and often result in the refusal for the siting of a mast. This inevitably leads to alternative Prior Notification applications for the same type of mast on a different site, which is usually in fairly close proximity to the previously refused application, but still without any prior discussion with the local community, planners and decision makers to achieve an outcome that is acceptable to the community and provides the desired coverage.

Decision makers do not wish to block improvements to their local connectivity and fully understand the need for appropriate infrastructure to support it. The current cat and mouse chase to find acceptable sites could easily be avoided if the telecom industry was required to work with the local authority to produce borough by borough strategic plans that would allow and provide consensus for such important infrastructure.

Godalming Town Council, believes such an approach would indeed level up the relationship between the telecom providers and the community they serve. This would help diminish the feeling that infrastructure is imposed upon a community for the benefit of the industry without regard to the local community and requests that you consider such requirements.

I look forward to being able to share your response with the Council.

Yours sincerely

Andy Jeffery
Town Clerk

CC: National Infrastructure Commission, Finlaison House, London EC4A 1AB
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